EXHIBIT 3

NOTICE

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24 COMPLETION.

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THE VIDEOGRAPHER: We're now on the record. Here begins tape number one in the videotaped deposition of Tamara Adams. It's taken in the matter of National Urban League, et al, versus Wilber L. Ross, Jr., et al.

Today's date, December 17, 2020. The time on the video monitor is 9:42 a.m. Eastern Standard Time. My name is Armando Forte. I am the videographer representing Planet Depos.

All parties are attending this deposition remotely. Will counsel please identify themselves and who they represent? Ms. Robinson.

MS. ROBINSON: Sure. My name is Anne Robinson from Latham & Watkins, counsel for plaintiffs. With me today are Shannon Lankenau and Amit Makker also from Latham & Watkins.

THE VIDEOGRAPHER: Mr. Sverdlov.

MR. SVERDLOV: Morning. Alexander Sverdlov from the U.S. Department of Justice Civil Division representing the defendants in this

action and the Census Bureau in this deposition. With me are a number of my colleagues from the U.S. Department of Justice and the Commerce Department whose names I believe have been read

prior to the opening of this transcript.

THE VIDEOGRAPHER: Other appearances will be noted on the transcript. Our court reporter for today is Cheryl Sandecki representing Planet Depos. She will now swear or affirm the witness and we will proceed.

THE COURT REPORTER: Ma'am, please raise your hand.

(Witness administered an oath.)

TAMARA ADAMS,

having been first administered an oath, was examined and testified as follows:

THE VIDEOGRAPHER: Please begin.

EXAMINATION

BY MS. ROBINSON:

Q. Great. Good morning, Ms. Adams. Thank you so much for joining us today.

A. You bet.

Q. So I'll just start with a few

introductory questions and some basic ground rules to begin before jumping into more substantive questions.

So can you please state your name for the record one more time?

A. Tamara Adams.

Q. And what is your current business address?

A. 4600 Silver Hill Road, Suitland, Maryland.

Q. And what's your job title?

A. Mathematical statistician.

Q. For the Census Bureau?

A. At the Census Bureau, yes.

Q. Okay. And how long have you had that position?

A. I've been at census for 22 years; in my current position for two.

Q. What position did you hold before that?

A. I have been a mathematical statistician since.

Q. I'm sorry. Since -- were you going to give a year?

A. 1998.

Q. Okay. But what was your job title prior to the one you currently have?

A. My job title has remained similar. I have changed positions within the Bureau.

Q. So what position did you hold before your current position?

A. The same job in a different division of

the Bureau.

Q. So what division are you in now and what division were you in previously?

A. I was in the research and methods director before. I'm now in decennial.

MR. SVERDLOV: I'm sorry. I just need to state an objection on the record. Objection, compound.

MS. ROBINSON: Okay.

BY MS. ROBINSON:

Q. Have you ever taken a deposition before?

A. No.

Q. This is your first time being deposed?

A. Yes.

Q. Okay. And you understand that even though you're in your house, not in a courtroom, that you're under oath today and need to testify truthfully?

A. Yes.

Q. Okay. And I'm sure counsel discussed this with you. But there's a just a few basic ground rules we say before all depositions so I'll just go over them now.

If you don't understand a question,

please ask me. If you answer a question, I will assume you understood it.

MR. SVERDLOV: Objection, misleading.

BY MS. ROBINSON:

Q. We have a court reporter who is taking down everything we say. And to make it easier for her, please let me finish my question before you start answering the question. And I will let you finish your answers before I begin asking the next question.

Does that make sense?

A. Yes.

Q. Great. If your attorney objects to my

question like Mr. Sverdlov just did, you must still answer it unless he specifically instructs you not to.

Does that make sense?

A. Yes.

Q. Is there any reason you cannot provide truthful and complete testimony today?

A. No.

Q. Are you on any medications that would affect your ability to give testimony today?

A. No.

Q. Great. So if at any point you need a break, please let me know and we will take a break. However, if there is a pending question before you, if I've asked a question, please answer it before asking for the break.

A. Okay.

Q. And one final thing about the breaks is please, and this is kind of a reminder to you and to everyone on the call here, given we have such a large group, please do not discuss the substance of your testimony with anyone during the breaks. So that can either be testimony

you've already given or what you might give in the future.

A. Okay.

Q. Is that clear?

A. Yes.

Q. Okay. Great. So I'm going to now turn to a few questions about the preparation for the deposition today. When did you first learn about this litigation?

A. Several months ago.

Q. Okay. And what has your involvement been prior to preparing for this deposition in the litigation?

A. Minimal. I've likely given information

for others at the Bureau to use.

Q. What type of information?

A. Answers to questions that I may have been asked.

Q. On what topics?

A. Data collection.

MR. SVERDLOV: Objection, beyond the scope.

MS. ROBINSON: I'm not asking this in her 30(b)(6) capacity. I'm just trying to get a

sense for what the witness knows and doesn't know with the litigation.

MR. SVERDLOV: So in light of my objection, the witness will answer in her personal capacity.

MS. ROBINSON: That's fine.

BY MS. ROBINSON:

Q. So I'm sorry, you were saying, Ms. Adams, questions about data sets?

A. Our data collection, operations and systems.

Q. For the census or your data collection for producing information in the litigation?

A. For the census.

Q. Okay. Thank you. If we -- if we could bring up Exhibit 1, please, which is the amended

deposition notice.

TECHNICIAN WERT: Sure. Stand by one moment. And mark this as Exhibit 1, Counsel; is that correct?

MS. ROBINSON: Oh, yes, thank you.

TECHNICIAN WERT: Sure thing.

(Whereupon, Adams Deposition

Exhibit 1 was marked for identification.)

TECHNICIAN WERT: Exhibit 1 is on screen now.

BY MS. ROBINSON:

Q. Ms. Adams, can you see that okay --

A. Yes.

Q. -- that document? Okay. I believe you've seen this before. This is the amended deposition notice?

A. Yep. Can you scroll down, please?

Q. Yes. Yeah, and if you could actually keep scrolling down until we get to the topics page. Perfect.

Okay. So have you seen this document before?

A. Yes.

Q. And you've reviewed it?

A. Yes.

Q. And you generally understand the topics listed here?

A. Yes.

Q. Great. So for the questions I ask today on those topics I will assume that you are

answering on behalf of the defendants unless you indicate otherwise.

Does that make sense?

MR. SVERDLOV: Objection, misleading and also inconsistent with the notice and our representations that this witness is being proffered on behalf of the Census Bureau.

BY MS. ROBINSON:

Q. You may answer.

A. Can you ask your question again?

Q. Yeah, sure. So for the questions -- yeah. So for the questions that I ask you today, I'll, you know, say that in relation to the topics that you are testifying on today as opposed to the next witness, your answers will be on behalf of the defendants unless you indicate others.

A. My answers are on behalf of the Census Bureau only.

Q. Okay. Great.

So looking at topic number one first, the Census Bureau's retention, organization and management of documents.

A. Yes.

Q. Did you prepare to testify about this topic today?

A. Yes.

Q. What did you do to prepare testifying on this topic?

A. Reviewed documents that have been provided as part of the collection efforts and discussed them with counsel.

Q. Okay. How long were your meetings with counsel, approximately, and how many were there?

A. We met Tuesday and Wednesday, probably six hours each day.

Q. Okay. Were those meetings in person, virtual?

A. Virtual.

Q. Did you take any notes during those meetings?

A. No.

Q. Did you review any documents other than what has already been produced this morning?

A. No.

Q. Did you speak to anyone other than

those meetings with counsel?

A. No.

MR. SVERDLOV: Objection, vague.

BY MS. ROBINSON:

Q. Okay. So moving on to topic two, did you prepare to testify today about topic two?

A. Yes.

Q. Did you use the same preparation process we just discussed for topic one?

A. Yes.

Q. Did you do anything in addition to that preparation process?

MR. SVERDLOV: Objection, vague.

THE WITNESS: No, no.

BY MS. ROBINSON:

Q. Okay. Are you prepared today to testify about topic three?

A. Yes.

Q. And did you prepare for it in the same way you prepared for topics one and two?

A. Yes.

Q. Did you talk to anybody outside of counsel to prepare for topic three?

MR. SVERDLOV: Objection, vague. And to the

extent that -- to the extent that this question verges into the nature and substance of the preparations that the witness had with counsel, I will instruct the witness not to answer.

MS. ROBINSON: Just to be clear, I said outside of counsel. So I'm not asking about what was discussed with counsel. I'm asking if she spoke with anybody to prepare for topic three beyond speaking with counsel.

MR. SVERDLOV: I will -- I will maintain the same objection. I will instruct the witness to answer to the extent she had any meetings or conversations where counsel was not also present.

THE WITNESS: I did not have any meetings where counsel was not present.

BY MS. ROBINSON:

Q. For the meetings with counsel, who else was present?

A. Can you clarify?

Q. Sure. So you met with counsel to prepare for this deposition today, correct?

A. Correct.

Q. Who was at those meetings? Can you

just give me the names, please?

A. Yeah, let me think.

Q. Sure. Take your time.

A. Hold on. Kathleen Styles.

Q. Okay.

A. And then we asked several people to join us. James Christy, Marianne Chapin, David Ragland.

Q. Okay. And then who -- what counsel was there? Mr. Sverdlov?

A. Yes.

Q. Anyone else?

A. A whole series of attorneys from DOJ and commerce whose names I do not know. I'm sorry.

Q. Understood. No problem at all.

A. There's a lot of people on that list.

Q. Right. That same group was at the meeting both days; is that right?

MR. SVERDLOV: Objection, misleading.

THE WITNESS: To the extent that I can recognize voices on the phone, yes.

BY MS. ROBINSON:

Q. Okay. Thank you.

Okay. And just to clarify, you will not be testifying today on topics four, five, and six, correct?

A. Correct.

Q. Okay. Great. Thank you. That's all with this exhibit, if you wouldn't mind taking it down. Great.

So Ms. Adams, now I'm going to turn to a few questions about the data and organization of data at the Census Bureau.

A. Sure.

Q. So perhaps it makes sense to start at a high level. Can you please provide an overview of the Census Bureau's data systems including the data information that is accessible on those systems that is related to the census?

MR. SVERDLOV: Objection. Vague and compound.

THE WITNESS: All right. So let's break that down quite a bit. So I think the first thing you asked are about the data systems at the Census Bureau, correct?

BY MS. ROBINSON:

Q. Uh-huh.

A. Okay. You've been provided with a slide deck that lists out the 52 systems that the census uses to collect decennial data and

process. Within those 52 systems, we accomplish all of the tasks we need to do to collect and process data, hire our staff, pay them.

Each of those systems has some method of storing the data, if necessary. Let's see, so you asked about the systems. You asked about the data that are underneath them, correct?

Q. Yes. We can go through the 52 if that is a more organized fashion to proceed in.

A. No, we don't need to go through -- if you'd like to go through each of the 52 systems we can, but if I remember your question right, you asked about the systems that we have and the data that we store within them.

Q. Uh-huh.

A. Okay. For those 52 systems, where appropriate, we have some sort of data -- some sort of mechanism with which we store data.

Often it is a database, sometimes it's a different method.

For the relevant systems that we have discussed in the last few days, each of those systems has one or many databases that underlie that system that store our data.

MS. ROBINSON: If we could please pull up

Exhibit 2.

(Whereupon, Adams Deposition Exhibit 2 was marked for identification.)

TECHNICIAN WERT: Stand by one moment.

BY MS. ROBINSON:

Q. So Ms. Adams, as he is pulling that up, I have not reviewed the documents that you -- your counsel produced this morning. But I do have the list of 52 from a PMR deck here so I do think, just so we're all talking about the same thing, given how technical this topic is, I just think it might be helpful to have the names up, if that makes sense.

A. Absolutely.

Q. Great. So if we can scroll down to,

it's page 147 on the bottom of the screen there. There we go. Great.

So if I could ask some questions about some specific systems as they are called on this slide.

A. Sure.

Q. Great. So -- well, as an initial matter, I'll ask a few larger topic questions and we can scroll through. There's just a

couple pages of these.

My first question is, are all of these 52 systems being used currently?

MR. SVERDLOV: Objection, vague, compound, and I will also object on the basis of foundation since counsel is referencing a document and we are not clear what the provenance of that document is.

BY MS. ROBINSON:

Q. Ms. Adams, you can go ahead and answer the question.

A. Okay. Let's go ahead and scroll -- can you scroll through each of them? Let me take a look at them real quick.

Q. Sorry, there we go. And you can also ask for control, Ms. Adams, so you can actually scroll through this at your leisure just to make sure that it's the right list.

A. Okay. So some of these systems have since been decommissioned.

Q. Uh-huh.

A. Because they're no longer in use for our data collection.

Q. Yeah. So which of the 52 are, in fact, not being used?

A. We can get that information for you. I can't produce a list off the top of my head.

Q. So sitting here today, you're not able to testify about which specific systems are in use currently at the Census Bureau?

MR. SVERDLOV: Objection, misleading.

BY MS. ROBINSON:

Q. You can answer.

A. Correct. We would need to gather a list of those.

Q. Okay. Can you tell me which systems are in use, to the best of your knowledge?

A. I can get -- if we want to know which systems aren't in use, we can get that list. If I don't know which once aren't in use, I can't know totally which ones are; it's just the converse.

Q. Okay. Do you know, for example, if number seven, the Census Data Lake is in use?

A. Yes, it is.

Q. Which other systems do you know are in use today?

A. Do we want to go line by line?

Q. Please.

A. The 2020 website, ATAC. I'm not

certain about BARCA. CAES. CaRDS. CBS. CDL. CEDSCI. I don't know about CEM. I do not know about CENDOCS. Centurion for decennial purposes is not in use any more.

CHEC is still in use. CHRIS. CIRA. I do not know if CQA is still fully -- has any pieces remaining. I do not about CRM. DAPPS is in use. I don't know about Desktop Services or the Data Management Platform. DRPS is in use. I don't know about DPACS.

Decennial Service Center is in use. ECaSE Enum is in use. ECaSE FLD OCS is in use. ECaSE ISR is not. I do not know if ECaSE OCS is still in use. I do not know about Geospacial Services or GUPS. iCADE is no longer being used for decennial purposes. IDMS is in use.

I do not know about ILMS. IPTS is in use. LiMA is not in use for decennial purposes. MaCS is not in use for decennial purposes.

MAF/TIGER is still being used. MCM I do not know. MOJO Optimizer is no longer in use. MOJO Field Processing is. NPC is not for decennial purposes. I do not know about OneForm Designer Plus. I do not know about PEARSIS.

Okay. Hold on. Let me read these

close. 42 in use. 43 is in use. 44 is in use. I do not know about 45. 46 -- I do not about 46. 47 is in use. SOA is in use. I do not about 49. 50 is still in use. 51 is still in use. And I do not know about 52 from a decennial standpoint.

Q. Okay. Thank you so much.

A. You bet.

Q. Are there any systems that are in use that do not appear on this list?

MR. SVERDLOV: Objection, vague.

THE WITNESS: This is a comprehensive list of all of the systems for the decennial census. So if your a system in the decennial system, you need to be on this list.

BY MS. ROBINSON:

Q. So there are no systems being used in the decennial census that do not appear on this list?

MR. SVERDLOV: Objection, vague and misleading.

BY MS. ROBINSON:

Q. You can answer.

A. So this is the comprehensive list of the 52 decennial systems we've used for data

collection and processing.

Q. Understood. But just to clarify, even though this is a comprehensive list, your testimony is that there are not any systems being used that do not appear on this list?

MR. SVERDLOV: Objection, asked and answered

and misleading.

BY MS. ROBINSON:

Q. Okay. So to start, I would like to ask you a few questions about the Census Data Lake.

A. Sure.

Q. Could you please tell me what is on that system and what it's used for?

A. Sure.

MR. SVERDLOV: Objection, vague -- sorry. Objection, vague and compound.

BY MS. ROBINSON:

Q. Please go ahead.

A. Okay. So let's start with what it's -- what is in there and then we'll talk about what it's used for. So what is in there is any census data that's response data, and paradata. And paradata are those data that are about our operations. Any of those data that need to be retained are in the Census Data Lake. So I

think that was question one, what is in there.

What it is used for is to generate reports for any ad hoc analysis that needs to happen and it is used to transmit data to other

systems to be used to -- for post processing.

Q. Thank you.

A. You bet.

Q. How long is the data retained on that system?

MR. SVERDLOV: Objection, vague.

THE WITNESS: If the question is are the data still there, yes, they are. The time frame by which it is -- the time frame that we maintain that data actively, we would need to go and find that answer for you.

BY MS. ROBINSON:

Q. Was that system used in prior censuses?

A. No.

Q. So turning to the general reports that you mentioned --

A. Uh-huh.

Q. -- what -- what are those reports that come out of the Census Data Lake?

A. Sure. So can we scroll all the way to the --

MR. SVERDLOV: Tammy, one second. I apologize. Objection, vague.

Please continue.

THE WITNESS: Sure. So the Census Data Lake houses the data and performs computations. System number 51, the Unified Tracking System, or UTS, is the business intelligence vehicle by which we display our reports and access them.

So the reports that are used to manage the census at headquarters are generated in CDL, and UTS is a pair of systems.

BY MS. ROBINSON:

Q. Just to make sure I understand, so the data comes from the CDL but the reports are viewed in UTS?

A. Exactly.

Q. Okay. I got it. Great. And what are the reports in UTS that draw on the data from CDL?

MR. SVERDLOV: Objection, vague.

THE WITNESS: There are a -- for each operation that occurs in the census there is a series of predefined reports. Those reports touch on topics like the progress of the census, that particular operation within the census, the

cost of that operation in the census, the quality of that operation.

So all of the things that we want to use to manage that operation from a headquarters perspective are generally included in the UTS.

BY MS. ROBINSON:

Q. Okay. And is there a document that provides a list of all of those reports?

A. Yes.

MR. SVERDLOV: Objection, vague.

BY MS. ROBINSON:

Q. What is that document called?

MR. SVERDLOV: Objection, assumes facts not in evidence.

MS. ROBINSON: The witness just said yes.

MR. SVERDLOV: In that case, objection, misleading. That was not the witness's testimony.

MS. ROBINSON: I can ask again.

BY MS. ROBINSON:

Q. Is there a document that lists the reports that are available from UTS?

A. There is a requirements document for UTS.

Q. Okay. And does that requirements

document list the reports available in UTS?

A. Yes.

Q. Was that document produced this morning?

A. Is that question for me?

Q. Uh-huh, if you know.

A. I do not know.

Q. Did you use that document to prepare for the deposition today?

A. No.

Q. Okay. About how many reports are listed on that document?

MR. SVERDLOV: Objection, vague and foundation.

THE WITNESS: Without the document in front of me, I wouldn't even try to guess how many there are.

BY MS. ROBINSON:

Q. Can you provide an approximation. Is it five reports or 500 reports?

A. Something between five and 500.

Q. Okay. How about between 300 and 500?

A. I don't know. We would have to get a

number for you.

Q. Okay. And are those reports that we're

talking about only the ones that are tied to the CDL data?

MR. SVERDLOV: Objection, vague.

THE WITNESS: Can you reask your question?

BY MS. ROBINSON:

Q. I can, yeah.

A. I want to make sure I hear it.

Q. It's very technical stuff and I don't have the documents in front of me. So I appreciate your patience here.

A. You bet.

Q. In my mind I'm picturing this requirements document that pertains to the UTS. And we know there is some set of reports that can be generated from UTS. We don't know the exact number.

I'm wondering if that requirements document and those reports from UTS are just related to data from the CDL or does UTS pull in data from other systems as well?

MR. SVERDLOV: Objection, vague and --

THE WITNESS: No, the --

MR. SVERDLOV: Objection, vague and compound.

THE WITNESS: UTS uses data only from CDL.

BY MS. ROBINSON:

Q. Thank you. Okay. Makes sense.

The reports that come from UTS, who receives those reports?

MR. SVERDLOV: Objection, vague.

THE WITNESS: So do you want a type of person who would receive those reports, groups of people? What kind of information are you looking for?

BY MS. ROBINSON:

Q. All of the above. If it's divisions that receive them on a regular basis. I'd like to know that. Whoever receives those reports.

A. It is those people who are involved in managing that particular operation at headquarters. So any of the executive staffs, any of the people working on that operation would receive the report.

In addition, there are some reports

that are sent to oversight. So they can also see how the census is progressing.

Q. Okay. How about Mr. Dillingham, what reports does he receive?

MR. SVERDLOV: Objection, vague.

THE WITNESS: We can get a list for you but I

couldn't tell you off the top of my head.

BY MS. ROBINSON:

Q. He receives reports on a regular basis?

MR. SVERDLOV: Objection, vague.

THE WITNESS: Again, we'd have to get a list.

BY MS. ROBINSON:

Q. Who would have that list?

MR. SVERDLOV: Objection, misleading.

THE WITNESS: So you're specifically asking about reports from UTS, correct?

BY MS. ROBINSON:

Q. Right.

A. Then we'd have to get that list from the people who manage UTS.

Q. Okay. And what group is that?

A. The people who manage UTS.

Q. Is there a --

A. UTS team.

Q. Fair enough. Okay. Is there a certain individual?

A. They've got a team of people who manage the UTS and we could get the information from them.

Q. Okay. So you don't know anyone's name who is on the UTS team?

A. There is many people on that team. We get it from whomever is most appropriate that day.

Q. Okay. Do the reports issued from UTS have to go to the disclosure review board before being released?

A. No, they're accessed within a system and when you authenticate to that system you accept that you can see data that are Title 13.

Q. Okay. Are all of the reports --

A. There are also reports that are emailed out, but they are at sufficient level that they do not contain any Title 13 data.

Q. Okay. What reports are those?

MR. SVERDLOV: Objection, vague.

THE WITNESS: We'd need to get a list of every report that's emailed. They are generally high level reports about the progress of a given operation.

BY MS. ROBINSON:

Q. Do you know about how many reports can be emailed?

A. Not without seeing --

MR. SVERDLOV: Objection, vague.

THE WITNESS: Yeah, not without a list.

BY MS. ROBINSON:

Q. Okay. And that would be the same list that you need to get from the UTS team?

A. Correct.

Q. Okay. So UTS generates a series of reports, some of which have to be viewed in the system because they have confidential information; is that right?

A. They have to be viewed in the system because that is how we are set up and it allows you -- one, there can be lower level information that would be considered title data. It also allows the ability for a user to interact with

the system and request information. I want to see completion as of 12/17 versus I want to see completion as of 12/16.

Q. Do you know if Mr. Dillingham reviews those reports in the system?

A. I do not know. We would have to ask.

MR. SVERDLOV: I want to object to the last question as vague -- on the basis that it's vague as to time.

BY MS. ROBINSON:

Q. So you provided a high level description of the type of data that's in the

CDL. Can we get a bit more granular and could you please provide the names of all of the columns that are in CDL?

MR. SVERDLOV: Objection, vague and foundation.

THE WITNESS: If -- we would need to get a document for you that has that if you would like to see the column names. I can describe the types of data that are in there. And I could name very many columns, but we would be here quite some time.

BY MS. ROBINSON:

Q. If you could please describe the types of data in CDL on the most granular level that you are able to.

A. Sure. So the data -- let's divide it into categories. I think that's probably the easiest way to describe it, and we'll go through it in kind of a set of chunks that touch each of our operations.

So likely the thing people are most familiar with is response data and those are data that we -- those are the data that we ask on our questionnaires from our respondents.

Things like a roster of people living

in a house on census day, their names, their ages, their sex, relationship to household or race, Hispanic origin. These are familiar to many people who have responded to the census. It's the same kinds of things you may have put into your own form.

All of those data that were collected from a respondent live in the CDL. So that's response data. And that's kind of the first

thing. For anybody who responded to the census, we've got their data in the CDL.

We also have paradata. Paradata varies by operation and by data collection method. Paradata is the data we collect about our data collection. So it can vary by the different data collection methods. For something like the internet self-response, we can know things like it took somebody one minute to answer this question or they were using a Firefox browser. Those kind -- that kind data would be collected for each operation.

For something like the nonresponse follow-up we would collect things like where the -- how long screen transitions took, whether or not -- I'm trying to think of types of

information that would be interesting and that we will likely talk about later.

Q. Yeah.

A. You know, how long did the interview take.

Q. Uh-huh.

A. Did somebody say they don't know to a

question or something of that nature.

Because we've got online handheld instruments and internet instruments now, we collect -- we have far more data than we ever had before to both manage, use our operations, manage or data collection and to use in post-processing. So that's great.

We also have data about every time that we contact a respondent, especially during the nonresponse follow-up. If we knock on a door we have a record of that. If we sent a case out for an assignment, we have a record for that. That's also kind of part of our -- it's -- while it's not listed on this slide, maybe you can consider it paradata. It is also part of the data that we store in the CDL. So that's a lot of things about how we collect data.

We also store how often people work.

Their time sheet data are stored in there so that we can do reports about how many hours people have worked, that sort of thing. All of those data are also stored in the Census Data Lake. Our workloads are stored there.

So those are the universe that we use for each of our operations. These IDs are eligible for internet self-response. This set of units is eligible for the nonresponse follow-up. This set of units is going to reinterview. All of that is also stored in the Census Data Lake.

Q. Great. Thank you. Very helpful.

A. Yes.

Q. Any other categories of data in the CDL that you didn't already cover?

MR. SVERDLOV: Objection, vague.

THE WITNESS: If there are, I'm not remembering them right at the moment. If we were to look at a list, I could probably give you more. But that covers likely the broad categories of data that are in the CDL.

BY MS. ROBINSON:

Q. Great. Is there a list of the categories of data in the CDL?

MR. SVERDLOV: Objection, vague.

THE WITNESS: Categories, no. The data that CDL receives and stores, yes.

BY MS. ROBINSON:

Q. What is that document called?

MR. SVERDLOV: Objection, vague and misleading.

THE WITNESS: I don't know that there is a name of it. It could be generated from the lake itself or there is various documents that talk about the data transfers that go to the lake.

BY MS. ROBINSON:

Q. Are those manuals?

A. Not manuals as you might think of them. They are -- between systems we have interconnection documents that document what data transfer between systems so that we know exactly what data are going where.

Q. Understood.

Do some of the other systems on this list of 52 feed into the CDL?

A. Many of them.

MR. SVERDLOV: Objection, vague.

BY MS. ROBINSON:

Q. Okay. Which ones?

A. This is likely a question best answered

by getting a very comprehensive list. Would it be easiest for me to answer those that will be relevant to many of the questions that were in the request for production?

Q. Yes. Thank you.

A. Okay. Let's do it that way.

All right. So the -- based on the request for production, I'm going to describe the systems that I -- that are relevant that we should -- that we'll talk about in those questions. This should not be taken to be a comprehensive list of everything that gives data to the lake. I think that would be a little -- in order to do a comprehensive list, we would want it written down rather than me telling you.

So the systems that are going to be relevant to our conversation today, let's go down to -- let's skip to, let's see -- the systems that are largely relevant to what we will discuss today, let's go down one more, please.

So ECaSE FLD OCS provides data to the lake. That is a large part of the data that creates reports for the nonresponse

follow-follow up. ECaSE FLD OCS is the system that we use to manage all OF our field assignments to transmit data to the enumerator device and it's where we receive the data back from the enumerator device. So that's what pumps data to CDL to make nonresponse follow-up reports. Let's go down --

Q. Sorry, can I ask you one question before you move off of that?

A. You can ask me many questions.

Q. What is the enumerator device?

A. So if you look at line 23 ECaSE Enum I think we've all probably seen pictures of the iPhones. Each enumerator is issued an iPhone and it has Enum. Often it's called FDC. That's what it's called on devise. The system itself is called ECaSE Enum and it's an application that lives on the device and that's what the enumerator interacts with to both collect data, to provide their availability, and to input their time and expenses.

Q. Thank you.

A. You bet.

Q. So I think you were going to move to

another system that feeds into CDL.

MR. SVERDLOV: Objection. There's no question.

THE WITNESS: So based on the -- what we'll discuss today, the ECaSE FLD OCS is the -- is the system that provides most of the data for the nonresponse follow-up reports that we'll likely talk about.

There is one more system. If you scroll down just one more, please. Thank you so much.

System number 47, SMaRCS, the Sample, Matching, Reviewing and Coding System. SMaRCS is the system that is used to choose cases for our quality control operations for nonresponse follow-up. So when we see things like NRFU RI or reinterview in reports and if documents, those cases are selected by SMaRCS.

So it does send some information, largely via field OCS, as it's kind of the route that it takes. But it's relevant to the conversations that we'll be having.

BY MS. ROBINSON:

Q. Thank you.

What do you mean by field OCS?

A. ECaSE FLD OCS. So if we scroll back up

a couple. I don't remember the numbers of the system.

Q. 24.

A. 24.

Q. Right. I'm sorry. Yes, the ECaSE.

A. And I will try really hard not to use acronyms, but just remind me if I do.

Q. Thank you.

Any other systems we should cover that feed into CDL?

MR. SVERDLOV: Objection, vague and compound.

THE WITNESS: For the purposes of what we're likely to discuss today, those are the highlights. We can discuss system number 26 ECaSE OCS. It sends the workloads so the universes for each operation it sends to CDL and so that will -- when we discuss things like self-response, completion rates and response rates, those come from a combination of ECaSE -- largely from ECaSE OCS.

BY MS. ROBINSON:

Q. Any other systems?

MR. SVERDLOV: Objection, vague.

THE WITNESS: Not that we are likely to discuss today. If we get into a spot where we

start going -- where you need more information, we can go through a specific system and how it interacts.

BY MS. ROBINSON:

Q. Okay. Thank you.

A. You bet.

Q. As far as querying the data, coming up with rates, is that done in CDL?

MR. SVERDLOV: Objection.

THE WITNESS: Yes.

MR. SVERDLOV: Objection, vague and compound.

BY MS. ROBINSON:

Q. Thank you. Can you describe how that's done in CDL, please?

MR. SVERDLOV: Objection, vague.

THE WITNESS: So can we choose a particular rate you want to discuss and we can talk about how that one is done? Because I think that's a

-- it helps us get on a very concrete path.
BY MS. ROBINSON:
Q. Sure. Does CDL -- does CDL contain the percentages of NRFU housing unit numbers enumerated by proxy?
A. Right. So the way that happens is each night after midnight a series of scripts are run

within the CDL and it runs automatically there is not a human that pushes a button every night that uses a set of predefined criteria to compute in this -- in this case something like the number of -- let's go with number of NRFU cases completed since it's reasonably straightforward, right. If we want -- every night CDL churns there is a series of scripts and it computes at various levels, whatever levels we specify the number of units that are completed, let's say for an 8. We're all interested in how ECaSE EO is progressing. Once those are precomputed, they're stored within CDL. UTS accesses them and when a user wants to see the data. It's available via the web interface in UTS.

So precomputation happens in the Census Data Lake and then it's displayed in UTS for users to see.

Q. Okay. Understood. So reports are not generated in CDL?

MR. SVERDLOV: Objection, vague.

THE WITNESS: The data that feed the reports are generated in CDL. UTS then accesses that data to display it to the user.

BY MS. ROBINSON:

Q. Okay. So?

A. Think of CDL and UTS as sister systems. They work together to display data for us.

Q. Okay. Okay. That's helpful. So how often is the data in CDL updated?

MR. SVERDLOV: Objection, vague.

THE WITNESS: The answer is it depends on the data that we are talking about and at which stage of processing we are discussing. So can you choose a specific type of data that you are interested in and I can describe how that works.

BY MS. ROBINSON:

Q. Yes how about the NRFU completion rates

to use your example?

A. I figure that was what you would pick.

So the public rates we display are a different discussion. So let's talk about a very specific component of it. Let's talk about the number of NRFU cases that have been completed.

So the data for those are sent as an -- as an enumerator transmits their data back so that kind of happens in the background, field OCS receives, it and sends it to CDL. CDL

receives it as fast as it can transit each of the systems that it has to go through, CDL received that data. CDL then has a series of processes that run multiple times during the day to bring that data into the data lake. However we don't create reports except once a day and we do that overnight after midnight. And the reason that we do that is that way each day we can compare from day-to-day exactly the same time period so that we're making our management decisions based on the same amount of data. So even though the data are updated more frequently

for that particular data source, we only compute the reports once per day.

Q. Understood. And then that when you are using those reports to do your comparison, are you viewing that in CDL or in UTS?

A. Generally in UTS. The reports are generally viewed in UTS. It's a -- it's actually a very pleasant interface to use.

Q. User friendly?

A. So it's generally people use the reports in UTS.

Q. Okay. That's helpful.

What divisions have access to the data

in CDL?

MR. SVERDLOV: Objection, foundation.

THE WITNESS: I can give you a list of -- a noncomprehensive list if you'd like. If we want a comprehensive list of every division, we would need to provide that to you.

BY MS. ROBINSON:

Q. Understood. Whatever you are able to tell me today would be helpful?

A. Okay. So the staff who administer CDL

and ADSD have access. The decennial statistical studies division has access. Staff and the research and methods directorate, staff in DMCD, Decennial Census Management Division. I guess I do, so staff who are in ADDC.

Q. Can you say what ADDC stands for?

A. Associate Director Decennial Census.

Q. Thank you.

A. No problem. I had to think hard on that one. And I'm certain there is other divisions but to do a comprehensive list we want to make sure we get a list of -- the divisions who actually do have access.

Q. Understood. Are there productivity rates of enumerators in CDL?

MR. SVERDLOV: Objection, vague.

THE WITNESS: Is there a specific metric that you -- that has been delivered that you want to ask about in one of the slide decks.

BY MS. ROBINSON:

Q. Yes. I can get to that later if that would be helpful to look at something specific?

A. It would, it would. I want to make

sure I answer the question correctly so that I don't mislead you.

Q. Okay. Okay. Turning back to the reports that are available in UTS?

A. Uh-huh.

Q. What are the format of the reports that are disseminated via email?

MR. SVERDLOV: Objection, vague.

THE WITNESS: Yeah, when we get an email that -- it's got very high level information in it and it varies by operation. So it will generally have some -- some numbers about completion or cost or whatever the thing that's been specified. And some slight graphics to tell you the state of the operation at that point.

BY MS. ROBINSON:

Q. Are they PDFs, excels?

A. Within the email it's simply an email that HTML based email that we receive. If you want more information, you have to log into the UTS.

Q. Okay. So every one who is getting that more granular information that is not available in email has to log into UTS to view it?

MR. SVERDLOV: Hold on one second. Objection, form.

THE WITNESS: So if you want to see the original UTS report yourself then you log into the UTS. What often happens is someone downloads it you can download into an Excel spreadsheet and that gets sent around via email.

BY MS. ROBINSON:

Q. Okay. So there is let's see two different formats that are emailed around, the HTML email plus Excel attachments?

MR. SVERDLOV: Objection, vague, compound, and misleading.

THE WITNESS: Right. So there is a predefined set of reports that go to a predefined set of people that are emailed by the

UTS itself. And again this isn't a human that emails it. The system itself sends out the an email as it's programmed to do. Those are HTML based reports that email receive each day.

However, often people will download them and I believe you guys have been provided with a very, very long document of lots and lots of numbers. Many of those come from the UTS, right. So we download perhaps combined with a handful of other reports, whatever, and sends it on. We reformat them for our bosses, that sort of thing.

BY MS. ROBINSON:

Q. Okay. Can we flip to Exhibit 6, please. This might be helpful?

TECHNICIAN WERT: And counsel just to clarify you would like to mark this as Exhibit 6, correct?

MS. ROBINSON: I'm sorry. If you could pull up Exhibit 6. This can be marked as Exhibit 2.

TECHNICIAN WERT: Okay. One moment. Counsel, I apologize. My screen froze real quick. And while I do that, the chart we were doing that I think you had referenced as Exhibit 2. Did you want that marked as

Exhibit 2?

MS. ROBINSON: Yes, thank you.

TECHNICIAN WERT: So this document Exhibit 6 will be marked as exhibit.

MS. ROBINSON: Three.

TECHNICIAN WERT: Exhibit 3. Thank you very much.

MS. ROBINSON: Thank you.

MR. SVERDLOV: While we are waiting for the exhibit to come up, we have been going for about an hour so I think we would like to take a break for a few minutes within the next opportunity. While this is going on maybe we can take a break now.

MS. ROBINSON: Sure, that's fine with me.

THE VIDEOGRAPHER: Okay. We are going off the video record at 10:44.

(Whereupon, a recess was had at 10:44 a.m. after which the deposition was resumed at 11:01 a.m. as follows:)

THE VIDEOGRAPHER: And we are back on the video record at 11:00 a.m. Please continue.

BY MS. ROBINSON:

Q. Ms. Adams, on that break did you speak

with anyone about the substance of your testimony?

A. Only with Mr. Sverdlov.

Q. And what did you talk about with Mr. Sverdlov?

MR. SVERDLOV: Objection. I will instruct the witness not to answer about the details of the conversation given that it is protected by attorney-client privilege.

MS. ROBINSON: On what basis is it protected by attorney-client privilege?

MR. SVERDLOV: I'm only instructing the witness not to get into specifics. She can discuss the general -- the general topics.

BY MS. ROBINSON:

Q. Okay. What topics were discussed with Mr. Sverdlov on the break?

A. Largely that I need to slow down and not speak so fast.

Q. Was anything of substance discussed?

A. About the things that I have said?

Q. Yes.

A. No, no.

Q. Were there any discussions of CDL?

A. No.

Q. Were there any discussions of any other databases?

A. No.

Q. Were there any discussions of what you might testify to after the break?

A. No.

Q. Okay. If we could turn to Exhibit 6, please.

TECHNICIAN WERT: On screen now marked as Exhibit 3.

(Whereupon, Adams Deposition Exhibit 3 was marked for identification.)

MS. ROBINSON: Okay. And would you be able to give Ms. Adams control of this exhibit so she could scroll through it?

TECHNICIAN WERT: Absolutely. So Ms. Adams, if you just click on the document on the screen that will give you control of my keyboard and mouse. You can zoom, scroll at your own pace.

THE WITNESS: Okay.

BY MS. ROBINSON:

Q. So is this document is very long. It's

605 pages. We will not go through every page.

A. Thank you.

Q. But can you -- can you tell me, is this data generated from CDL?

MR. SVERDLOV: Objection, vague.

THE WITNESS: Which pieces of data?

BY MS. ROBINSON:

Q. Okay.

A. Can you clarify for me?

Q. Sure. Why don't you walk me through the document, and my question is, where does the data in this document come from?

MR. SVERDLOV: Object to form.

THE WITNESS: Okay. So there is 605 pages of data here.

BY MS. ROBINSON:

Q. Sure.

A. Can you clarify which pieces you are talking about?

Q. Yes. Let's start with page 1.

A. Okay.

Q. Where is this from?

A. All right. Let me blow it up so I can

see it.

Q. Uh-huh.

A. The data in this document come from the CDL or data that -- the data in this table come

from the CDL.

Q. And does the table itself come from the CDL?

MR. SVERDLOV: Objection.

THE WITNESS: It does not.

BY MS. ROBINSON:

Q. Where does the table itself come from?

A. The table itself is an Excel spreadsheet.

Q. Is the Excel spreadsheet downloaded from UTS?

A. Pieces of it are.

Q. Okay. So how does this Excel spreadsheet get generated?

A. The various pieces of data that are combined together are collated from either the UTS or from special tabulations from CDL and are then put into a spreadsheet together each morning.

Q. Is this one of the reports from UTS that we were talking about earlier or something different?

MR. SVERDLOV: Objection, vague.

THE WITNESS: This spreadsheet is not -- you don't just pick an item and download it from

UTS.

BY MS. ROBINSON:

Q. Okay. This gets -- this Excel spreadsheet is generated every day?

A. During data collection, yes.

Q. Okay. And what system generates it?

MR. SVERDLOV: Objection, foundation.

THE WITNESS: So there isn't a system that generates it.

BY MS. ROBINSON:

Q. Okay.

A. The data sources are combined into one Excel spreadsheet.

Q. Okay. Who makes the Excel spreadsheet?

A. Staff in DCMD.

Q. What does DCMD stand for?

A. Decennial Census Management Division.

Q. Okay. So an individual pulls the data from CDL and UTS every day to generate this Excel?

A. Yes.

Q. Okay. Is it a specific individual in DCMD who does this?

A. It is a staff that's charged with doing that.

Q. The DCMD staff or something more specific?

A. The DCMD NRFU staff.

Q. NRFU staff. Okay. How many people are on the NRFU staff?

A. Something greater than three, but less than 15.

Q. Thank you.

A. Yeah.

Q. And what is the DCMD NRFU staff's general responsibility?

MR. SVERDLOV: Objection, vague.

THE WITNESS: Can you clarify, please?

BY MS. ROBINSON:

Q. Sure. What do they do? What are their

job duties?

A. They manage the NRFU operation from a project management standpoint.

Q. Okay. Do these reports have a name?

MR. SVERDLOV: Objection, vague.

THE WITNESS: The page 1, right?

BY MS. ROBINSON:

Q. Uh-huh, yes. Yes, these Excels that are populated by the NRFU staff.

A. They are the state-based completion

rates.

Q. Okay. Okay state-based completion rates.

And who receives these Excels every day?

MR. SVERDLOV: Objection, foundation.

THE WITNESS: An email list of -- a list of people on an email thread.

BY MS. ROBINSON:

Q. Okay. Who is on that email list?

A. We'd have to get the definitive list for you. It's generally those people who are working on the nonresponse follow-up operation

at that point.

Q. Does management receive this spreadsheet?

MR. SVERDLOV: Objection, vague.

THE WITNESS: Which component of management or who specifically?

BY MS. ROBINSON:

Q. Anyone at the management level.

A. Yes.

MR. SVERDLOV: Objection, vague.

THE WITNESS: Yeah, various managers receive it.

BY MS. ROBINSON:

Q. Okay. Which managers are those?

A. Like I said before, we would have to get you a definitive list.

Q. Does it go to a list serve or is it individual people's addresses?

A. Individual people's addresses.

Q. Okay. Can you approximate about how many people receive this?

A. Not well.

Q. Do you think it's upwards of 50?

A. I honestly don't know. We would have to get a count for you.

Q. Okay. Do you know if Mr. Dillingham receives this?

A. I do not. We would have to, again, look at the list of people who were sent it each day.

Q. Do you know if anyone outside the Census Bureau receives this?

A. I do not know.

Q. Okay. So this data is by state, correct?

A. Yes.

Q. Can it also be pulled by city?

MR. SVERDLOV: Objection, form.

THE WITNESS: No, we did not do that.

BY MS. ROBINSON:

Q. But can this type of data be pulled at the city level?

MR. SVERDLOV: Objection, form.

THE WITNESS: I'm thinking. Give me a second.

I don't think so. There are -- and in

order to give a really great answer, remember, I'm an statistician. Numbers matter very deeply to me. There would have to be -- I don't know that it could be done at the city level. I'd have to have -- we'd have to have conversations with people who are experts in each of these components to determine if it could be done at the city level.

BY MS. ROBINSON:

Q. Okay. Are the spreadsheets kept somewhere?

MR. SVERDLOV: Objection, vague.

THE WITNESS: Yes. I mean, they are clearly an email because we all got emailed them each day. That would be, you know, an incredibly easy way to get them.

As for a single repository, yes.

BY MS. ROBINSON:

Q. Okay. And can you identify that repository for me?

A. I can get the -- we can get the specific location for you.

Q. Okay. Do you know if it's on a certain

drive shared location?

A. Like I said, we would have to get the specific location for you.

Q. Okay. So just to make sure I understand, if a person was looking for this type of information at a more granular, geographic level, whether that's ACO, tracked, county, what would be possible to provide?

MR. SVERDLOV: Objection, vague and compound.

THE WITNESS: How do you mean?

BY MS. ROBINSON:

Q. How granularly could this data be pulled by geography?

MR. SVERDLOV: Objection, vague.

THE WITNESS: I'd want to talk to -- like I said, I would want to talk to the people who are experts in each of these components to make sure that there is not some nuance that I'm missing

on what level we could actually use.

BY MS. ROBINSON:

Q. And who are those people that are the experts?

A. Likely people in DCMD who run each of

the operations.

Q. Okay. But you don't think that CDL would have this data more granularly by geography?

A. It -- it isn't a matter of whether CDL has the data more granularly by geography. It is that I would want -- before I answer a question like that, I would want to make sure there is not some nuance that I'm missing that would cause us to have an inaccurate answer by making the data very granular.

Q. Okay.

A. So it's not a matter of can we pull it. It's more a matter of --

Q. Right.

A. -- is it appropriate to do so in order to provide the best answer we can.

Q. What do you mean by appropriate to do so?

A. Is there anything in combining these

data at a lower geography that would cause us to provide an answer that's misleading or incorrect.

Q. Okay. How would the answer be misleading?

A. If we were to provide a -- an estimate for a certain day and there was a -- the answer is, I don't know and I would prefer to actually give a very concrete definitive answer than to make one up while we -- while we chat.

Q. Okay. Understood.

Picking one data field, self-response in the NRFU universe, that's column H.

A. Yes.

Q. Does that data come from CDL?

A. Yes.

Q. And is that data maintained on a tracked level?

A. These data aren't maintained at the tracked level because we don't compute them that way. Rather, CDL receives data. It's a lake. A data lake merely has records of data. We then choose what level we are going to compute it. We've chosen the state level for this. So it's computed at the state level. It can be computed

at other levels, should we so desire.

Q. So the data in column H could be computed at the tracked level?

A. As far as I know, yes.

Q. Let's look at page 4, please.

A. Okay.

Q. Okay. So please tell me where -- how these reports are generated.

MR. SVERDLOV: Objection, form.

THE WITNESS: Presume -- I think I got all messed up here. One moment, please. There is a very nice lag between me taking an action and the document moving.

So for the document -- for page 4, presumably it's an Excel spreadsheet.

BY MS. ROBINSON:

Q. Uh-huh.

A. I do not know the data source.

Q. Okay. Does this look like a UTS download?

MR. SVERDLOV: Objection, calls for speculation.

THE WITNESS: No.

BY MS. ROBINSON:

Q. Have you ever seen this type of report

before?

MR. SVERDLOV: Objection, vague.

THE WITNESS: Before late in the day, yesterday, no, I don't think I've seen this one before.

BY MS. ROBINSON:

Q. But you think you saw it late in the day yesterday?

A. Yes.

Q. Okay. So you reviewed this in preparation for the deposition?

A. Yes.

Q. Okay. So what can you tell me about it?

MR. SVERDLOV: Objection, form.

THE WITNESS: Can you be more specific?

BY MS. ROBINSON:

Q. What system generates this spreadsheet?

A. I do not know. We'd have to go find out what the -- pardon me, who the source of it was and where they pulled the data from.

Q. Who receives this spreadsheet?

A. I do not know.

Q. How often is it generated?

A. I don't know. Again, we would have to

go find the person who generated it and how frequently -- where they got the data.

Q. Okay. So you reviewed this document yesterday. But you're not able to provide any testimony about it?

MR. SVERDLOV: Objection, misleading.

THE WITNESS: I reviewed the 605 pages that are in this document yesterday and we did not discuss the source of the data for this particular page.

BY MS. ROBINSON:

Q. Okay. Understood.

Let's flip to page 6.

A. I'm trying. I really am.

Q. Okay. So how is this spreadsheet generated?

MR. SVERDLOV: Objection, vague.

THE WITNESS: Staff and field fill out each column each day when they have updates.

BY MS. ROBINSON:

Q. What system do they use to provide those updates?

A. So there is actually very little system-generated data in here. The impetus of this report are the RCC actions to the right.

Q. How does the text get inputted into the table?

A. The various regional offices provide the data to field headquarters.

Q. And field headquarters inputs the data into a spreadsheet?

A. Yes.

Q. Is this an Excel spreadsheet?

A. Yes.

Q. And it's not maintained through a database or system?

A. No.

Q. So there is a single Excel spreadsheet that field management uses to enter the information?

MR. SVERDLOV: Objection, misleading.

THE WITNESS: Yes.

BY MS. ROBINSON:

Q. Where is this Excel spreadsheet maintained?

A. I don't know. We could find out for you.

Q. Who views this spreadsheet?

MR. SVERDLOV: Objection, vague.

THE WITNESS: Staff and field headquarters.

BY MS. ROBINSON:

Q. Okay. What's the name of this spreadsheet?

MR. SVERDLOV: Objection. Assumes facts not in evidence.

THE WITNESS: Oh, I don't know. It's an exhibit here.

BY MS. ROBINSON:

Q. Okay. So it's an Excel spreadsheet used by the field headquarters and staff. And is there any other information you can tell me about it?

MR. SVERDLOV: Objection, form.

THE WITNESS: How do you mean?

BY MS. ROBINSON:

Q. Does it get emailed out to anyone?

A. I don't know.

Q. How is it used by the field

headquarters?

MR. SVERDLOV: Objection. I'm going to object to that question on the basis of scope because it exceeds the scope of the topics noticed for the deposition. And also --

MS. ROBINSON: I'm just asking. Sorry. Please go ahead. I apologize.

MR. SVERDLOV: The specific substance of the document, which is what we seem to be discussing now, is far afield from the general topics that have been noticed in the deposition. And so to the extent the witness answers that question, it will be in her personal -- personal knowledge and personal capacity, not on behalf of the Census Bureau.

MS. ROBINSON: Well, I disagree with that. I'm just trying to get at the purpose of this data spreadsheet, which is clearly in scope, but we can put that dispute aside and I will ask again.

BY MS. ROBINSON:

Q. What is the purpose of this spreadsheet?

MR. SVERDLOV: Objection, vague and obviously the same objection as before.

THE WITNESS: The purpose of the spreadsheet is to track the actions we're taking for -- that have been taken in ACOs where there is a reason to track what they are doing, so in order to make sure that we're managing our ACOs properly.

BY MS. ROBINSON:

Q. Okay. And can you be a little more

specific on when you said what the ACOs are doing?

MR. SVERDLOV: Objection, form.

THE WITNESS: So in the column that says RCC actions --

BY MS. ROBINSON:

Q. Yes.

A. -- there's updates about the management actions they are taking each day.

Q. Uh-huh. Okay. Let's turn to page 17, please.

TECHNICIAN WERT: Ms. Adams, I know there is a lag, so if you need help from the technician just navigating from one page to the next, let

me know.

THE WITNESS: Go for it.

MS. ROBINSON: That's fine. We can give the control back. I thought it would be more helpful for you to go back and forth. But let's go with someone else.

TECHNICIAN WERT: You still have control but you are on page 17 now.

BY MS. ROBINSON:

Q. Okay. Do you recognize this spreadsheet?

A. From my review yesterday, yes.

Q. Okay. Does it have a name?

A. I don't know.

Q. Okay. What system generates this spreadsheet?

MR. SVERDLOV: Objection, vague.

THE WITNESS: It is not system generated.

BY MS. ROBINSON:

Q. Okay. Is this an Excel?

A. Yes.

Q. And how is the -- how does the Excel get populated with information?

A. Staff would need to fill out each field.
Q. And what staff fills out the fields?
A. Staff in the RCC, our field headquarters.
Q. Okay. So this is another spreadsheet used by field headquarters?
A. Yes.
Q. Okay. Are these spreadsheets kept in a central repository?
A. I don't know.
Q. How often is this spreadsheet generated?

A. I don't know.
Q. Okay.
A. I can find those answers for you if you would like. But I don't know them right now.
Q. If we could look at page 23, please.
Do you recognize this spreadsheet?
A. Yes.
Q. Is it generated from a system?
A. No.
Q. This is manually composed?

A. There is -- there is not a system that has all of these pieces of data.
Q. So how is this document generated?
A. Someone generated it on the frequency with which they wished to generate it.
Q. Is it an Excel?
A. Presumably, yes.
Q. Who generates this?
A. I don't know.
Q. Who uses this?
MR. SVERDLOV: Objection, vague.
THE WITNESS: I can't speak to who would use it or who uses this in their daily lives.
BY MS. ROBINSON:
Q. Do you know who receives this document?

A. These were provided by either Jamie Christy or Al Fontinow. So either one of the two of them.
Q. Provided to whom?
A. Counsel at DOC.
Q. Provided to counsel at DOC for this litigation?
A. Yes.

Q. Okay. So if we wanted to know anything about these reports, we should talk to Mr. Christy or Mr. Fontinow?

A. Yes.

Q. Okay. Do you know what the goal column refers to?

MR. SVERDLOV: Objection. I'm going to, again, object on grounds of scope and because that question is outside the scope of the topics noticed for the deposition. The witness will testify in her personal knowledge or capacity, not on behalf of the Census Bureau.

MS. ROBINSON: Again, I reserve my same objection which is it's clearly in scope. I'm simply asking about the type of data that's maintained by the Census Bureau. This is a piece of data that's maintained by the Census

Bureau and I would like to know what the goal column means.

MR. SVERDLOV: I will just say that the meaning of a column is the substance of the document and that is not the topics that are noticed in the deposition. But we can reserve

that and move on.

MS. ROBINSON: Yeah, because I'm not asking what the significance of what the goal meant to Mr. Fontinow, for example. I'm just asking from a data perspective what over what gives you 2.9. From a data perspective, what does goal refer to.

MR. SVERDLOV: I maintain the objection.

BY MS. ROBINSON:

Q. Okay. Ms. Adams, please answer.

A. I don't know.

Q. Do you know what "off goal by" means?

A. No.

Q. And do you know what the number "active" means?

A. No.

Q. Okay. Let's go to page 101, please.

Have you seen this report before?

A. Yes.

Q. How is it generated?

A. Can we scroll over a little bit, please?

TECHNICIAN WERT: Sure. Ms. Adams, you

actually still have control if you want to scroll over.

THE WITNESS: Go ahead and do it. Perfect. Thank you.

Can you please reask your question?

BY MS. ROBINSON:

Q. Sure. How is this report generated?

A. It is a combination of data from UTS and --

Q. I'm sorry, I thought you were still answering the question.

A. No, I'm sorry I was waiting for you.

Q. Oh, I'm sorry. I thought you were saying it's a combination of data from UTS and --

A. Oh, I must have broken up. MOJO Hermes.

Q. Okay. Is the spreadsheet itself exported from UTS?

MR. SVERDLOV: Objection, vague.

THE WITNESS: Yeah. I mean, I can't speak to the mechanics of how whomever put it together did that.

BY MS. ROBINSON:

Q. Okay. I'm a little confused then. So you can scroll through. It's 400 pages long. Is this a download from a system or is it manually put together?

MR. SVERDLOV: Objection, vague.

THE WITNESS: Can you do me a favor and scroll down for a little bit?

TECHNICIAN WERT: Sure.

BY MS. ROBINSON:

Q. It goes until page 500 -- let's see, I have it here with me.

A. Don't go all the way to the bottom. Just scroll for a little bit.

Q. It goes to 191 ^ ck all the way through.

A. Okay. Hold on. Yeah. So while the -- it looks like it's many, many, many, many pages long. It's a series of reports over days. So it looks a little more daunting than I think it is.

Q. Uh-huh. Okay. So what group maintains this spreadsheet?

A. To be honest, I don't know. We would have to ask.

Q. Who would know?

A. Either Al Fontenow or Jamie Christy, whomever this came from.

Q. Okay. Do you know what this spreadsheet is used for?

MR. SVERDLOV: Objection. I'm going to object based on scope again. And so same instruction -- or same qualification that the witness will answer not on behalf of the Census.

MS. ROBINSON: Same response.

BY MS. ROBINSON:

Q. Do you know what this spreadsheet is used for?

A. Do I know what somebody used the spreadsheet for? No.

Q. Do you know who receives this spreadsheet on a regular basis?

A. No.

MR. SVERDLOV: Objection. Foundation.

BY MS. ROBINSON:

Q. Do you know if a spreadsheet like this -- well, strike that. Let's move on.

So if we could go back to CDL, I

thought that the spreadsheets in this exhibit were going to be good examples of CDL or UTS spreadsheets, so that's why I turned to that. So I thought it would be helpful in our conversation to walk through this just to -- just so you know why I flipped to that and then am going back. So that's the context.

A. Okay.

Q. Let's see. So turning back to CDL and UTS, I have a few questions about whether specific calculations can be done in those databases.

A. Okay.

Q. Okay. So --

A. Yep.

Q. Could you calculate percentages of NRFU housing unit numbers enumerated by proxy?

A. Yes.

Q. Okay. Can you calculate the unit numbers enumerated by proxy but excluding vacant and nonexisting housing?

A. Yes.

Q. Does that calculation occur in CDL?

MR. SVERDLOV: Objection, vague.

THE WITNESS: It -- hold on. Let me think

for just a second.

BY MS. ROBINSON:

Q. Of course. Take your time.

A. Yes, it occurs within CDL with -- it occurs in the CDL system with the data that is in CDL.

Q. If you wanted to generate a report of that data, would you generate that report out of UTS?

A. No.

Q. Would you generate it from CDL?

A. Yes.

Q. Why couldn't you generate it from UTS?

A. UTS are predesignated reports, so if we chose to have a report with exactly that, you had a lot of things on there, right?

Q. Yes.

A. And then it could absolutely be done in UTS.

Q. Okay.

A. However, we purpose -- CDL can be used

to generate reports, the aggregates for reports, and it can also be used for ad hoc analyses. That would be one of them.

Q. Understood. Okay.

So UTS conceivably could be used, but you'd have to come up with a whole report. So it would just be more efficient to use CDL?

A. UTS we pre-specify.

Q. Right. But I'm thinking you could add one more report where you prespecified some sort of new calculation, right?

A. Sure. If that's the route we chose to take, yes.

Q. Okay. But it would be quicker to query that information directly from CDL?

A. Yes.

Q. Have you done that calculation?

MR. SVERDLOV: Objection, vague.

BY MS. ROBINSON:

Q. I can say it again. The NRFU housing unit numbers and percentages enumerated by proxy but excluding vacant and nonexistent housing.

MR. SVERDLOV: Same objection.

THE WITNESS: There are estimates of proxies. We would need to look at definitions and what has been done to determine if the vacant and do not exists are excluded.

BY MS. ROBINSON:

Q. Okay. And by estimates of proxies,

what do you mean by that?

A. The calculations.

Q. Okay. So --

A. Sorry, I'm a statistician. I use estimates a lot.

Q. Okay. So there are calculations of by proxy in CDL; is that correct?

A. Uh-huh.

Q. And it's possible to exclude vacant and nonexisting housing, correct?

A. Yes.

Q. But you are not sure if that's been done?

A. Correct.

Q. Okay. Thank you.

How long -- if you wanted to run that calculation, how long would it take to do so?

A. A day or two.
Q. Okay. What about NRFU housing unit numbers and percentages enumerated by population count only, is that possible to do in CDL?
A. Yes.
Q. Has that been done?
A. I don't know.
Q. Okay. Do you know if it's been done to

respond to any of the requests in this litigation?
MR. SVERDLOV: Objection, vague.
THE WITNESS: I do not know -- I mean, I don't know.
BY MS. ROBINSON:
Q. Yeah. Understood.
Okay. And how long would it take to run that calculation?
A. The same. Each of these are kind of several day sorts of things to ensure that they are calculated properly.
Q. Okay. And to view that information -- and I apologize if I have asked this before, I'm just trying to get a handle on all of this -- so

to view that information, you would generate a report from CDL?

A. Can you define what you mean by report? I want to make sure we don't mix up terminologies.

Q. I thought you said that CDL itself -- I know UTS has reports and they are the predesignated ones. But I thought you said CDL also has reports.

A. CDL is a data lake. It doesn't have

reports like you're thinking about it. You can query things. You can create numbers. It doesn't -- the things you put in front of me a little bit ago in 605 pages, you don't just make an Excel spreadsheet like that, right? You query data and then you create a report out of it.

So you might type a whole bunch of computer code and then have numbers, and then I would put it into some format that I could share with others to report about.

Q. Right. Okay. And what is that format that comes out of CDL so you can share with

others?
MR. SVERDLOV: Objection, vague.
THE WITNESS: It is up to the particular person who is creating the code.
BY MS. ROBINSON:
Q. So you could -- it could be an Excel?
A. Yes.
Q. Okay. Is there a typical format that's used to share the information from CDL?
MR. SVERDLOV: Objection, vague.
THE WITNESS: I agree that is vague. It depends on the number being created and how a

particular data analyst is going to share it or what's been requested of them.
BY MS. ROBINSON:
Q. Okay. I'll ask it this way. What are the possibilities?
A. Okay.
Q. Excel?
A. Excel.
Q. What else is used?
A. CSV. CES data set. That's not an exhaustive list, but that would be kind of the

big ways that one would create what you're terming a report.

Q. Okay. Or what word should I use? I'll ask it that way. A download?

MR. SVERDLOV: Objection, form.

THE WITNESS: It's fine. It's fine.

BY MS. ROBINSON:

Q. Okay. So it would take a couple of days to generate an Excel of the NRFU calculations we discussed earlier?

MR. SVERDLOV: Objection, vague.

THE WITNESS: Something of that nature, yes.

BY MS. ROBINSON:

Q. Thank you.

Could you do those calculations based on an ACO level?

A. Yes.

Q. Could you do it based on a tracked level?

A. As far as I know, yes, but with the same condition that we talked about when we were looking at the first page of the 605-page document.

Q. Yes?

A. I want to make sure there's not some nuance I'm missing.

Q. Yes. Okay. Understood.

What about at a city level?

A. The same idea. I would want to make sure that, again, there is not some nuance that I just -- that -- I don't understand and would give you a misleading answer.

Q. Right. But you can do calculations by city in the CDL?

MR. SVERDLOV: Objection, vague.

THE WITNESS: I don't know. I would have to look at some very detailed data to figure out -- to determine.

BY MS. ROBINSON:

Q. Okay. I'll ask it this way then.

A. No --

Q. What are -- withdrawing.

What are the geographic levels that are in CDL?

MR. SVERDLOV: Objection, vague.

THE WITNESS: Yeah, like I said, I would have to actually look to determine what data are in there. I can't answer it without doing that.

BY MS. ROBINSON:

Q. Okay. Is there a document like a manual that would list out that -- those fields?

A. There are -- there are documents called ICDs, Inter Connection Control Documents, that talk about the data that flow between systems. One of those documents would have in it the data that flowed between -- that flowed into CDL and what kinds of fields are in it.

Q. Okay. And would you have to look at a number of different ICDs for that information or would a single ICD have that?

A. It's in many.

Q. So you would have to look at several to piece it all together?

A. Yes.

Q. Okay. Okay. Are there any reports in UTS that provide the population count only enumerations?

MR. SVERDLOV: Objection, vague.

THE WITNESS: I don't remember. I would have to look at a list of the reports.

BY MS. ROBINSON:

Q. Okay.

A. I'm sorry.

Q. No, that's fine.

What about the -- are there UTS reports that include the percentages enumerated by proxy?

A. I believe there are, but, again, I would want to confirm by looking at a list.

Q. Okay. What about by proxy excluding vacant and nonexisting housing?

A. It's the same idea. I don't want to give you information that's incorrect.

Q. What about NRFU percentage enumerated using administrative records? Is that -- are you able to calculate that in CDL?

A. So that question -- hold on. Let me put together a really good answer for you.

Q. Okay. Take your time.

A. Thank you. So we don't actually enumerate people in administrative records as

we're doing the NRFU, right? That happens during our post-processing as we gather all the data from NRFU from internet self-response, from paper returns. So that -- we wouldn't enumerate a person by administrative records during NRFU. That would come after our post-processing.

Q. Okay. And so what database would you use to reflect the administrative record had been used?

MR. SVERDLOV: Objection.

THE WITNESS: Not until DRF2, CUF or CEF would that truly be available.

BY MS. ROBINSON:

Q. So which of the 52 systems would --

MR. SVERDLOV: Objection.

THE WITNESS: System-wise -- sorry about that. I'm trying to behave. System wise it would be DRPS.

BY MS. ROBINSON:

Q. Okay. Sorry. You said that and I didn't realize that was one of these. DRPS, let me just -- oh, okay. Great. Number 20. Okay.

Yeah, so on the administrative record

topic for one second, I had seen that PEARSIS had mentioned administrative records in the definition. Is that system used for this purpose?

A. PEARSIS processes the data from administrative records and then provides it to DRPS to be used in the actual census tabulations.

Q. Understood. Okay. And is PEARSIS being used in this census?

A. Yes.

MR. SVERDLOV: Objection, vague.

BY MS. ROBINSON:

Q. Okay. Thank you.

So if we wanted to know how many units were being counted through administrative records, that would be a calculation from DRPS?

A. Yes.

Q. Okay. And so --

A. Specifically -- go ahead.

Q. Sorry, please.

A. No, you're good.

Q. You were going to say and specifically?

A. No, you first, you first.

Q. Okay. Well, I was going to ask you the questions then about how the data from DRPS is downloaded, what --

MR. SVERDLOV: Objection, form.

THE WITNESS: What do you mean? That one I need some help with.

BY MS. ROBINSON:

Q. How did you get the information out of the system so you can view it?

A. The DRPS produces data files. There is not a reporting system from it or anything like that. It's product our census data files. Those files are on servers and you perform calculations on those using computer code.

Q. Okay. You perform the calculations on the files themselves or the data in DRPS?

A. Generally on the files that result from DRPS.

Q. Okay.

A. And those we've referred to as DRF. CUF, CEF.

Q. What do those stand for?

A. Decennial Response File, Census Unedited File and Census Edited File. Sorry

about that. I try with the acronyms.

Q. That's okay. And so I'm sorry, what was the first acronym? DRF?

A. Yes, Decennial Response File.

Q. Okay. And so is the DRF the first stage and then there is certain metrics performed and then it's the CUF?

A. Yeah, they're sequential in the order that I listed.

Q. Okay. And so at what point is -- do the administrative -- I'll start again.

At what point are the administrative records reflected in that data?

MR. SVERDLOV: I'm sorry. Hold on one second. I'm going to object to form.

You can go ahead.

THE WITNESS: I'm thinking.

BY MS. ROBINSON:

Q. Sure. Take your time.

A. I don't know which of those two or which of those three. It is one of them and I don't want to give you an incorrect answer.

Q. Okay. But in one of those three

files --

A. Yes.

Q. -- there would be a column indicating

that an administrative record was used --

A. Right.

Q. -- for (inaudible)?

A. I believe it is DRF1 but I'm not certain.

Q. Okay. And has that occurred yet?

A. DRF1 is currently being produced.

Q. So would it be possible today to figure out how many instances the administrative record is being used?

MR. SVERDLOV: Objection, vague.

THE WITNESS: Preliminary estimates, yes, but until all the census processes are actually done and the data are ready for tabulation, you wouldn't have a final estimate. You could only have preliminaries.

BY MS. ROBINSON:

Q. And how would you pull that preliminary data?

A. How do you mean?

Q. How would you find the answer?
A. Sorry. I don't understand.
Q. No, no, I'm sorry. And my questions are -- this is not what I do for a living.
So if -- I understand that it would

just be preliminary. But --
A. Uh-huh.
Q. -- if you, today, were to figure out how many times the administrative record was used in the count, how would you go about doing that? What system would you use?
A. We would have an analyst write some computer code to perform an ad hoc tabulation to do so --
Q. Okay.
A. -- on the -- on the files that DRPS produces.
Q. Okay. DRPS is a system? Oh, yes, that's number 20.
A. Decennial Response Processing System.
Q. Okay. And can you give me an estimate how long it would take to write that code and do that tabulation?

A. Again, several days in order to ensure that the tabulations are done correctly.

Q. Okay. Thank you.

Are there -- in the DRPS data on administrative records, are there divisions between high quality and low quality?

MR. SVERDLOV: Objection, vague and

foundation.

THE WITNESS: Wait, could you ask that again, please?

BY MS. ROBINSON:

Q. Sure. Are there divisions in the administrative record data between high quality and low quality?

MR. SVERDLOV: Same objections.

THE WITNESS: There is a -- yeah, sorry about that. There are those that we deem acceptable for use --

BY MS. ROBINSON:

Q. Okay.

A. At various points in the process.

Q. Uh-huh.

A. And that's how we make that. It's less

high quality, low quality as this is of sufficient quality for us to use for a given purpose.

Q. And is that data kept somewhere?

MR. SVERDLOV: Objection, vague.

BY MS. ROBINSON:

Q. The data that shows which ARs are of sufficient quality to use and which ARs are not?

MR. SVERDLOV: Objection, form.

THE WITNESS: Yes.

BY MS. ROBINSON:

Q. Is that in DRPS?

A. No.

Q. Where is that kept?

A. It would be kept in a combination of -- it would be in CAES and could have it may be in PEARSIS. CAES is C-A-E-S.

Q. And then does DRPS only reflect the administrative records that have been deemed sufficiently acceptable?

A. Correct.

Q. Okay. And you think we would have to query both PEARSIS and CAES to fine --

A. I believe --

Q. -- to fine the number -- that's fine -- to find the number of ARs that were deemed not sufficiently acceptable?

MR. SVERDLOV: Objection, form.

THE WITNESS: Yeah, I believe so.

BY MS. ROBINSON:

Q. Okay. Do you know if a code would have to be written to figure out that information in PEARSIS and CAES?

A. I don't know, but presumably, yes.

Q. Okay. And if that is the case, would it take -- case, case -- would it take two to three days in your estimation?

MR. SVERDLOV: Objection, calls for speculation.

THE WITNESS: Something of that nature.

BY MS. ROBINSON:

Q. Okay. Thank you.

A. Multiple days, let's go with that.

Q. Yeah, understood.

So I have a couple more of these. NRFU housing unit numbers and percentages missing

certain information such as name or date of birth?

A. Okay.

Q. Is that information in CDL?

MR. SVERDLOV: Objection, vague.

THE WITNESS: It is.

BY MS. ROBINSON:

Q. Do you know if it's in any of the UTS reports?

A. I don't believe it is.

Q. Okay. What about information regarding total in-person household enumerations?

MR. SVERDLOV: Objection.

THE WITNESS: Total in-person household. I'm struggling a little bit with that one --

BY MS. ROBINSON:

Q. Okay.

A. -- and what you mean by it.

Q. So I would like to know if CDL could provide a calculation of in-person household enumerations versus enumerations by proxy?

MR. SVERDLOV: Objection, form.

THE WITNESS: Yeah, preliminary estimates,

yes.

BY MS. ROBINSON:

Q. Why would they be preliminary?

A. Because the census hasn't been the -- the census post processes haven't been run yet, so you would only be able to tell for a given operation how many were with household members versus with a proxy. You wouldn't be able to tell across the operations because the processes haven't been done net.

BY MS. ROBINSON:

Q. Thank you.

And by operations do you mean different geographic operations?

A. No, the census is composed of a series

of operations. Examples include internet self-response, paper data capture, nonresponse follow-up, update leave. So each of those is a different way that people can submit their data.

Q. Okay. Could you do the calculation of enumerations in person versus proxy for 2010 in CDL?

A. No, no.

MR. SVERDLOV: Objection, vague.

THE REPORTER: Counsel, did you say objection, vague.

MR. SVERDLOV: I did.

THE WITNESS: I'm trying, I promise.

BY MS. ROBINSON:

Q. You can answer. Why not?

A. CDL contains data from 2020.

BY MS. ROBINSON:

Q. Okay. Was CDL used in 2010?

A. No.

Q. Where is the data maintained for 2010?

MR. SVERDLOV: Objection, foundation.

THE WITNESS: In the census data warehouse.

BY MS. ROBINSON:

Q. Is that an archived system?

MR. SVERDLOV: Objection, vague.

THE WITNESS: It's a -- yeah, so it's -- the data are -- in the census data warehouse as part of the research and methods directorate and our stored in -- I'm thinking. Give me a second. Yes, I know that they are in the census data warehouse.

BY MS. ROBINSON:

Q. Okay. Can the census data warehouse be queried?

A. Yes.

Q. Okay. Does the census data warehouse keep the data at a similar level of granularity as the CDL?

A. Yes.

Q. Is there any data related to the 2010 census that is not kept in the CDW?

MR. SVERDLOV: Objection, vague.

THE WITNESS: Yeah, it -- I -- what kind of -- I need a little more --

BY MS. ROBINSON:

Q. Sure.

A. -- specifics on that one.

Q. Yeah, I understand.

So if we wanted to do comparisons of some of the metrics we just discussed such as

proxy, proxy excluding vacant houses or nonexisting addresses and compared those same metrics to the ones from 2010, would all of the 2010 data be in the CDW?

MR. SVERDLOV: Objection, form.

THE WITNESS: To compare to final -- to compare to final data, yes.

BY MS. ROBINSON:

Q. Okay.

A. If we're comparing to -- many of the summary counts are in published assessments already that we would refer back to.

Q. Okay. But do you know if a published assessment includes for 2010 the number of proxies excluding vacant or nonexisting households?

A. Yes.

Q. There are published assessments that have that metric?

A. Uh-huh. And not to cut you off, but are we going to take a break here pretty soon?

MS. ROBINSON: We can take a break now if you need one, yes. Yeah, I'm happy to.

THE WITNESS: If we need to finish a little set, that's fine. But at some point we need to take a little pause.

MS. ROBINSON: If you'd like a break now,

let's do it.

THE WITNESS: Great.

MS. ROBINSON: Yes, yes. Any time, please ask me. I don't want to make this more painful.

THE WITNESS: It's not painful. Just we need a break.

MS. ROBINSON: That's fine. Actually, it's 12:10. The time has flown. Should we take, you know, 20 minutes for lunch or what makes sense?

THE WITNESS: That would be great.

MS. ROBINSON: Great. So we will go back on at 12:30, sorry.

MR. SVERDLOV: One second. Could we take half an hour? There is something I need to take care of as well. And just come back at 12:40.

MS. ROBINSON: 12:40 it is. Sounds great. Thank you both.

THE VIDEOGRAPHER: Okay. Going off the video record at 12:11.

(Whereupon, a recess was had at 12:11 p.m. after which the deposition was resumed at 12:50 p.m. as follows:)

THE VIDEOGRAPHER: And we're back on the record at 12:49. Please continue.

BY MS. ROBINSON:

Q. Great. Ms. Adams, did you talk to anyone about the substance of your testimony during that break?

A. No.

Q. So back to the 2010 data in the CDW, is that maintained on a tracked level?

MR. SVERDLOV: Objection, vague.

THE WITNESS: What kind of information do you want to know about the data? Can you clarify for me.

BY MS. ROBINSON:

Q. Sure. For example. The proxy data, how many households were enumerated by proxy?

A. The data there are the equivalent of the Decennial Response Files, the CUF, the CEF. So it would be maintained on a record-by-record granularity.

Q. All right. Could you query the database to figure out that statistic on a tract basis?

A. Presumably, yes.

Q. Okay. Do you know if you would have to

write a script to query the database in that way?

A. Yes, somebody would have to write code.

Q. Are there any reports that are accessible from that CDW database?

A. No.

Q. And to download the information from the CDW database, do you download it to an Excel?

MR. SVERDLOV: Objection, vague.

THE WITNESS: Whomever writes the script would create an output file such that it could be used for whatever reporting purposes are needed. Excel is one option; comma separated.

BY MS. ROBINSON:

Q. Great. Okay.

Turning back to the 2020 census and the data available in the CDL, is it possible to calculate the percentage of addresses in the NRFU universe that were obtained during the closeout phase?

A. It is actually not possible to do that calculation in CDL.

Q. Could you do it in another database?
A. Yes.

Q. Which one?
A. We would use MOJO Hermes to perform that calculation on the field OCS data.
Q. And what is the field OCS?
A. Do you remember how -- when we talked about the systems and there was ECaSE FLD OCS?
Q. Yes.
A. That.
Q. What does OCS stand for again?
A. Operational Control System.
Q. Okay. And if we wanted to know when addresses were added to the master address file, how would you figure that out?
MR. SVERDLOV: Objection, form.
THE WITNESS: Let me think for a second. So we would ask geography division how many addresses got added to the master address file as a result of whatever process we cared about that added addresses.
BY MS. ROBINSON:
Q. Can you give me an example of the

process?

MR. SVERDLOV: Objection, form.

THE WITNESS: That one I'm going to need a little more clarification for, please.

BY MS. ROBINSON:

Q. What I'm trying to ask is can you figure out by date when an address is added to the master address file?

A. So -- so -- yes. The answer to that is yes, we can.

Q. Okay. And what system would you use to do that?

A. I would use -- let's flip back to the list of systems we had up.

Q. That's Exhibit 2. If someone can pull that up.

A. System number 35, MAF/TIGER.

Q. Okay. Does MAF/TIGER also provide data on how each address is enumerated?

MR. SVERDLOV: Objection, vague.

THE WITNESS: Yeah, can you ask me that a little differently? I think I do need a little clarification there.

BY MS. ROBINSON:

Q. Sure.

A. Thanks.

Q. Does MAF/TIGER reflect which addresses were enumerated by proxy?

MR. SVERDLOV: Objection, vague.

THE WITNESS: Yeah. No, it doesn't. MAF/TIGER is a list of addresses.

BY MS. ROBINSON:

Q. Okay.

A. So it does not have that information with it.

Q. It also has the date in which each address was entered into the file; is that right?

A. I would have to check specifically which date it would carry with it and if we would have to use a combination of data to determine exactly what date addresses were added.

Q. Okay. Understood.

What database would you use to calculate the percent of addresses that were

unresolved after data collection concluded?

MR. SVERDLOV: Objection, speculation.

THE WITNESS: The data from DRPS. So what -- one of the later response files, the CUF or the CEF.

MR. SVERDLOV: For the record, my objection was to foundation. I think it didn't reflect accurately in the live transcript.

BY MS. ROBINSON:

Q. And does that DRPS file have a field or column to indicate which addresses were unresolved after data collection concluded?

A. I don't know that it has a specific column to tell you this one is resolved or this one is not resolved. It has information that allows us to know that.

Q. What information is that?

A. To provide a list of fields I would need to look at the specific fields that are in each file.

Q. Could you give me a couple examples?

MR. SVERDLOV: Objection, vague.

THE WITNESS: Again, not without looking at

specifically what's -- what is in each file as they're specified.

BY MS. ROBINSON:

Q. And what are the files?

A. The DRF-2, CUF and CEF.

Q. Right. Okay.

About how many fields do those spreadsheets have or files have?

MR. SVERDLOV: Objection, vague.

BY MS. ROBINSON:

Q. You can answer.

A. We would want to look at the documentation to provide a good answer.

Q. Can you provide me an approximation? Is it more than a thousand?

A. I don't think so. But, again, I would want to look at the documentation.

Q. Okay. Did you review those files before the deposition?

A. No.

Q. Okay. Okay. Does the CDL calculate the number and percent of NRFU addresses

enumerated as vacant housing units?

A. Yes.

Q. Okay. Does it calculate the number and percent of NRFU vacant housing unit enumerations -- I'm sorry. I've asked you this about administrative records. We've already been over that.

Does the CDL calculate the vacancy rate based on the total number of occupied and vacant addresses?

MR. SVERDLOV: Objection, form and foundation.

THE WITNESS: I'm not certain if it calculates that exact rate. Again, I would want to look at documentation to make certain I'm telling you the right answer.

BY MS. ROBINSON:

Q. And the documentation you would look at are the ICDs?

A. No. I would look at the requirements for the UTS reports.

Q. Okay. But the CDL can do more calculations than just what's reflected in the

UTS reports, correct?

MR. SVERDLOV: Objection, form and foundation.

THE WITNESS: Someone can write scripts to form additional calculations, yes.

BY MS. ROBINSON:

Q. Okay. I thought that the CDL could be queried in ways other than how the UTS reports are structured.

A. It can.

MR. SVERDLOV: Objection, form

BY MS. ROBINSON:

Q. Okay. So do you think the CDL could be queried to determine the vacancy rate calculated

based on the total number of occupied and vacant addresses?

A. Preliminary numbers, yes. But for final answers, you have to wait until the decennial post processing is done.

Q. Okay. Okay.

What about reinterview data, is that in CDL?

MR. SVERDLOV: Objection, vague.

THE WITNESS: Yeah, I do need you to be a little more specific about that, please.

BY MS. ROBINSON:

Q. Sure. Well, how -- I'll ask this. What types of data is kept on the reinterview process?

MR. SVERDLOV: Objection, foundation.

THE WITNESS: So it depends on which part of the process that we're discussing. Can you be really specific about kind of what you want to know about?

BY MS. ROBINSON:

Q. Maybe you can walk me through the processes. I'm interested in how they get triggered and what the results are and where that data is kept.

MR. SVERDLOV: Objection. Form of the question, vague and compound.

THE WITNESS: All right. Let's start with how cases are triggered.

BY MS. ROBINSON:

Q. Okay.

A. Okay. A series of data goes from FOCS

to SMaRCS. These are two systems we talked about before. And there is a series of tests performed on those data to determine if it is -- if that case or that -- if that case is likely to have issues or if a given enumerator is likely to have issues.

It also uses administrative records in a different -- we match the responses to administrative records to determine if they are likely to be falsified. And a series of checks are performed largely using paradata. So that's data about the interviewing process itself.

And if a case is likely enough to be falsified, it is more likely to be selected for a reinterview than if a case is not likely to have been falsified or to have issues. They are all about the selection process. Those data are kept in SMaRCS.

So I think the second part of your question was about, what about the results of noninterview -- sorry, reinterview.

Q. Of the reinterview.

A. So each case is sent out to the field

and the results of the reinterview are kept in the same way that the results of any other NRFU interview are kept. They come back to FOCS. They are transmitted to CDL. They are also transmitted to SMaRCS.

The results in SMaRCS are then post-processed and if needed a clerk will review the information to determine if there is any sorts of problems with the original interview. And if there are, they can suggest that -- that that enumerator's work be failed. And all of those data are kept within SMaRCS.

Q. Okay. Thank you.

So --

A. Yep.

Q. And the data in SMaRCS can be queried?

MR. SVERDLOV: Objection, vague.

THE WITNESS: The SMaRCS data is stored in an Oracle database so it can be queried as any other Oracle database could.

BY MS. ROBINSON:

Q. And you can export data from an Excel into it?

A. If the data are summarized enough, yes.
Q. Could the re -- could the reinterviewed data indicating which cases have been selected for reinterview be exported into an Excel?
A. One second. I'm doing calculations in my head. If you want record-by-record, it would have to be put into many Excels. If you want summary tabulations, then you would be okay. How many --
Q. Would the summary tabulations be by tract?
A. They can be.
Q. What program is used to assign the enumerators their work?
MR. SVERDLOV: Objection, foundation.
THE WITNESS: Sorry, Alex.
MR. SVERDLOV: That was it. Thanks for waiting. Objection, foundation. But I'll add a form objection as well.
BY MS. ROBINSON:
Q. So you can answer. Yeah, sorry.
A. MOJO Route Optimizer.

Q. Okay. Is that the MOJO Field

Processing or MOJO Optimizer Modeling?

A. MOJO Optimizer Modeling.

Q. Oh, that one is still in use. Okay.

MR. SVERDLOV: Objection, form.

BY MS. ROBINSON:

Q. Does MOJO Optimizer Modeling track the enumerator's progress?

MR. SVERDLOV: Objection, vague.

THE WITNESS: Yeah. So I need you to ask specifically what you mean by that.

BY MS. ROBINSON:

Q. Sure. Is the productivity of each enumerator tracked?

MR. SVERDLOV: Objection, vague.

THE WITNESS: Not in the optimizer itself.

BY MS. ROBINSON:

Q. Where is it tracked?

A. The productivity -- so let me -- I do need a lot of clarification on this.

Like which measure are you talking about, which -- I want to make sure I give you the right source information.

Q. So the Census Bureau has released productivity rates.

A. Okay.

Q. Where does that -- where is that data stored?

MR. SVERDLOV: Objection, vague and foundation.

THE WITNESS: And I'm sorry to be pedantic about this. I just want to make sure I give you the right answer. Can you show me a source of this data so -- so I can make sure that I tell you right? As we saw, 605 pages of numbers flew around. I want to make sure I get this right.

BY MS. ROBINSON:

Q. So I think I will in one of the exhibits coming up. But I did think in the beginning of the overview on CDL, you mentioned that paradata such as productivity rates were maintained in CDL.

MR. SVERDLOV: Objection, form. Go ahead.

THE WITNESS: I was going to say what I said was paradata such as the enumerators' pay records are stored there, not their productivity. So the number of hours they work are stored in CDL.

BY MS. ROBINSON:

Q. Okay. But if you wanted to know of their assigned workload on a given day, how much of it was completed, what database would you look in?

MR. SVERDLOV: Objection, form and foundation.

THE WITNESS: So let me repeat back to you. Of the work they were assigned that day, how much of it was completed?

BY MS. ROBINSON:

Q. Uh-huh.

A. Yes, you can look in CDL.

Q. Okay. Can you tell me what optimizer data is?

A. I can tell you what the optimizer is. I can tell you what data is. I'm not certain -- can you clarify what you mean by optimizer data?

Q. Yeah, or the optimizer software?

A. Okay. The optimizer software is a piece of software that uses the enumerator's home location. Special skills they may have such as language, their ability to speak other languages. The work that's available in their

area, the amount of time that they've said they're available, the hours they say they are available and a series of priorities given to each case to determine the most optimal route, not for that individual enumerator, but for the group of enumerators in a given area.

Q. Okay. Does that software take into account hard-to-count populations?

MR. SVERDLOV: Objection, vague.

THE WITNESS: Yeah, cam you describe what you -- not what you mean by hard-to-count populations but by take into account?

BY MS. ROBINSON:

Q. Does it account for whether -- when the optimizer is providing that route information, is that determined or related to which populations in the area are hard to count?

MR. SVERDLOV: Objection, vague.

THE WITNESS: The optimizer uses -- if the enumerator speaks another language and if the respondent has already said that they speak a different language, it will match those up. It does not take into account the -- any of the

hard to enumerate scores.

BY MS. ROBINSON:

Q. Uh-huh. Where are the hard-to-enumerate scores or -- I'll rephrase.

What data system of the 52 uses the

hard-to-count scores?

MR. SVERDLOV: Objection, assumes facts not in evidence.

THE WITNESS: I'm trying to think through the list of where that would be used. And I think to best satisfy that answer, it would behoove us to actually provide some documentation. Off the top of my head, I couldn't tell you who uses it and who doesn't.

BY MS. ROBINSON:

Q. Okay. Do you know if it's in CDL?

A. Actually, I don't.

Q. Okay. Do you know if it's -- do you know if it is in any UTS reports?

A. I don't know.

Q. Okay. What about Geo data, what database is that kept in?

MR. SVERDLOV: Objection to form and

foundation.

THE WITNESS: I need a little help with what you mean by Geo data.

BY MS. ROBINSON:

Q. My understanding is that -- well, I think you said at the beginning that some of the data that -- that CDL kept was data as far as

where the enumerators were at all times so you could tell how long an enumerator was standing at someone's front door, for example.

A. Oh, okay.

MR. SVERDLOV: Objection, Foundation and form.

BY MS. ROBINSON:

Q. Is that Geo data kept in CDL?

A. If it is not in CDL, it is in FOCS.

Q. Okay. So it might be in CDL?

A. Correct. Field by field I would want to look at documentation before I answered you.

Q. Okay. And what is FOCS?

A. Field Operational Control System.

Q. Okay. I don't see that on the list.

A. ECaSE FLD OCS.

Q. Oh, ECaSE. Thank you.

A. I want to say it's like 20 something.

Q. Yes, ECaSE. Thank you.

Okay. I have a couple other questions about the master address file and MAF/TIGER. Is the DCF extracted from MAF/TIGER?

MR. SVERDLOV: Objection, vague.

THE WITNESS: DCF? Can you define?

BY MS. ROBINSON:

Q. The (inaudible) -- sure. It's the control file, the decennial control file that we've been talking about. Or DRF. I'm sorry. DRF.

A. Okay.

Q. That's all the acronyms. Is the DRF an extract from MAF/TIGER?

A. It is not an extract from MAF/TIGER. It uses data from MAF/TIGER.

Q. Okay. Is the DRF an extract from a system?

MR. SVERDLOV: Objection, vague.

THE WITNESS: The -- no. It's not an extract

from a single system.
BY MS. ROBINSON:
Q. Okay. What systems are used to compile it?
MR. SVERDLOV: Objection, vague.
THE WITNESS: It uses data from MAF/TIGER, CARDS, CDL, I believe PEARSIS, and we would want to check documentation to make sure I didn't miss anything else.
BY MS. ROBINSON:
Q. Okay. Thank you.

How are the -- I should ask it this way. In the DRF, is every address listed?
MR. SVERDLOV: Objection, vague.
THE WITNESS: Yeah, that one I need a little help with.
BY MS. ROBINSON:
Q. Sure. I'm trying to understand the granularity of the DRF pile -- file. And I'm wondering if it's based on an address-by-address basis?
A. Yes, it is.
Q. Okay. And are any addresses not

included in that total file?

MR. SVERDLOV: Objection, vague.

THE WITNESS: Yeah, help me out a little bit with that one, please.

BY MS. ROBINSON:

Q. Sure. So we -- certain addresses, if they're determined to be vacant, for example, are those still included in the DRF?

A. Yes.

Q. Okay. Is there any filtering out of addresses that are considered not sufficient in some way --

MR. SVERDLOV: Objection, vague.

BY MS. ROBINSON:

Q. -- when completing the DRF?

MR. SVERDLOV: Objection, vague.

THE WITNESS: I need a little help with that, please.

BY MS. ROBINSON:

Q. Sure. So we talked about when you were doing administrative records that certain ones were not sufficient to include. I'm wondering if there is a similar quality check processes on

the addresses.

MR. SVERDLOV: Objection, vague.

THE WITNESS: As long as an address is in the MAF, the decennial MAF, it's eligible to be included in the DRF.

BY MS. ROBINSON:

Q. Okay. And you said eligible. But is it -- are all of them included automatically?

A. Yeah, sorry.

Q. That's okay.

A. That was poor terminology on my part.

Q. I figured. Thanks.

Okay. A couple questions on SMaRCS.

A. Sure.

Q. My understanding is that it applies

quality control algorithms?

A. Correct.

Q. What are those? Which ones does it apply?

MR. SVERDLOV: Objection, compound.

THE WITNESS: Yeah I -- I do need that broken down a little bit more, if you could.

BY MS. ROBINSON:

Q. Oh, I was just saying the same thing. Which algorithms apply?

MR. SVERDLOV: Objection, vague.

THE WITNESS: In -- in what vein do you mean which algorithms does it apply? As in --

BY MS. ROBINSON:

Q. Well, the document says that SMaRCS applies quality control algorithms.

A. Can you get me back there so I can see it?

Q. Yeah, yeah, we can switch back. That's the description of what the database is, so I was just reading that.

A. Okay.

Q. See number 47?

A. Yes.

Q. So which ones are those, which kind of

quality control is going on there?

MR. SVERDLOV: Objection, compound.

THE WITNESS: Did somebody say something?

MR. SVERDLOV: I objected.

BY MS. ROBINSON:

Q. But you can answer.

A. Okay. So we talked about SMaRCS selecting cases, receiving the results and performing a clerical match, right?

Q. Yes.

A. So when this is saying SMaRCS applies quality control algorithms, that's what it's talking about.

Q. Well, I remember the rereview process but are there other quality control processes that it performs?

MR. SVERDLOV: Objection, foundation.

THE WITNESS: So we enact our quality control in NRFU by selecting cases for reinterview. So when we say, you know, a reinterview case, that's part of our quality control algorithms.

BY MS. ROBINSON:

Q. Yep.

A. Right? So when we discussed that SMaRCS uses things like administrative records

and paradata to determine cases more likely to be falsified and then selects those for reinterview, and then receives the data so that it can compare the original interview to the

reinterview, all of those things we talked about are the quality control algorithms that SMaRCS applies.

Q. Okay. Understood. Are there any others besides that process?

A. Are we talking about nonresponse follow-up or are we talking about address canvassing?

Q. Let's start with address canvassing.

A. So for address canvassing, the -- rather than interviewing an individual house, the lister canvasses a block and makes updates to the address list.

So, similarly, SMaRCS receives the data from, in this case LiMA, about the individual blocks that have been canvassed and performs a series of tests to determine if that block is likely to have been falsified -- to have lower quality work.

Q. Okay.

A. And then selects cases for QC work, for

quality control work that are based on the results of those tests.

Q. Okay. And what about for NRFU, what is done on that?

MR. SVERDLOV: Objection.

THE WITNESS: For NRFU it's a very similar process but we already went through that one.

MR. SVERDLOV: I'm sorry, I'm going to put an objection. I don't mean to interrupt. I'm going to object to form on that.

BY MS. ROBINSON:

Q. Could you please explain what the quality control process is for NRFU that's in SMaRCS?

MR. SVERDLOF: Objection, foundation.

THE WITNESS: So like we discussed, SMaRCS receives data from FOCS about the original interview. It -- there is a match to administrative records that uses the paradata to determine if the case is likely to have lower quality results or be falsified, and then it selects cases more likely to be falsified more frequently.

Those cases -- and that generates a reinterview case. The case is reinterviewed in

the field. It comes back to SMaRCS. SMaRCS compares the two interviews, the original interview and the reinterview. And if there are issues, it goes to a clerk who can recommend that there were problems with that case or with that enumerator, and if action needs to be taken on those -- that enumerator.

BY MS. ROBINSON:

Q. Okay. Is the decennial directorate the division responsible for maintaining all the data and systems that support the census?

MR. SVERDLOV: Objection, foundation.

THE WITNESS: Sorry, I think I need a little bit of help with that one.

BY MS. ROBINSON:

Q. What's the group that's responsible -- I'm sorry, just trying to get a sense of which group or division is responsible for all these data and data systems and databases.

MR. SVERDLOV: Objection, vague and compound and form.

THE WITNESS: So the decennial directorate is responsible for what each system is going to do. Some of the systems lie within the decennial directorate and are part of the organization

that is the decennial directorate. Some of the systems are outside of the decennial directorate and live elsewhere. They are used either -- they are in a variety of places throughout the Bureau.

BY MS. ROBINSON:

Q. Okay. Thank you. Is the CDL in the decennial directorate?

A. No.

Q. Okay. Is UTS?

A. No.

Q. Where is the CDL housed?

A. ADSD.

Q. Would you mind telling me what that stands for? And apologies if you have already done that.

A. Hold on. I got to think hard.

Q. We can also look it up.

A. Yeah. It's Application something something Division.

Q. Okay. And where is the UTS housed?

A. Same place, ADSD.

Q. Great.

A. Now, we should be very clear, it's organizationally housed there.

Q. Yes.

A. The actual infrastructure and data are housed as part of the -- one of the decennial contracts.

Q. Okay. Thank you.

Could we look at Exhibit 3, please.

TECHNICIAN WERT: Sure. And, Counsel, to clarify, is that the document that we marked as Exhibit 3 or the file name Exhibit 3?

MS. ROBINSON: The file name Exhibit 3, please.

TECHNICIAN WERT: Sure. Stand by one moment. And we will mark this as Exhibit 4; is that correct?

MS. ROBINSON: Yes.

(Whereupon, Adams Deposition Exhibit 4 was marked for identification.)

MS. ROBINSON: That sounds right. So could you scroll down so Ms. Adams can see the whole document. I think maybe the bottom might be

helpful. Great. And then back up to the first page.

BY MS. ROBINSON:

Q. Have you seen this document before?

A. Yes.

Q. Okay. Can you tell me what database is used to generate the data in the three columns?

MR. SVERDLOV: Objection, assumes facts not in evidence.

THE WITNESS: It is generated from page 1 of the 605 page document that you showed me earlier.

BY MS. ROBINSON:

Q. I'm sorry, can you be more clear? What is -- it's generated -- it's not generated from a system?

MR. SVERDLOV: Objection, form.

THE WITNESS: It is -- it comes from the spreadsheet we talked through earlier.

BY MS. ROBINSON:

Q. And who maintains that spreadsheet?

A. DCM NRFU.

Q. Okay. How are calculations like these

run on that spreadsheet?

MR. SVERDLOV: Objection, vague and assumes facts not in evidence.

THE WITNESS: So each of the columns -- each of the pieces of source data are taken from UTS reports, special tabulations from CDL. They are

put into that spreadsheet and then the numbers that we see here are generated from that spreadsheet.

BY MS. ROBINSON:

Q. Okay. So the data is from UTS and CDL. It goes in to the NRFU staff spreadsheet?

A. Yes.

Q. And then the NRFU staff spreadsheet is used to calculate the numbers on this page?

A. Yes.

Q. Okay. Thank you. Very helpful.

A. You bet.

Q. Would -- how often is a document like this created?

MR. SVERDLOV: Objection, vague.

THE WITNESS: Yeah, could you -- could you be a little more specific?

BY MS. ROBINSON:

Q. Sure. So this document says report date, 9/29/20. Are these reports generated every day?

A. Yes.

Q. Okay. And who generates them?

A. DCMD NRFU staff.

Q. Are they always on a state level or are

they done at a more granular geographic level?

MR. SVERDLOV: Objection, compound.

THE WITNESS: State.

BY MS. ROBINSON:

Q. Who receives these documents?

MR. SVERDLOV: Objection, vague and assumes facts not in evidence.

THE WITNESS: Like we talked about with the spreadsheet before, we need to look to determine who was on that "to" list. And this document is available to the public.

BY MS. ROBINSON:

Q. Uh-huh. Okay. Are these reports maintained in a central repository?

MR. SVERDLOV: Objection, vague.

THE WITNESS: Yeah. I mean, they were in email for sure and they are maintained in a repository. And like we talked about before, we'd have to find out the exact name for you.

BY MS. ROBINSON:

Q. Okay. Thanks. Could we turn to the file name that's called Exhibit 4, please.

TECHNICIAN WERT: Sure. Stand by one moment. And, Counsel, are we marking this as Exhibit 5?

MS. ROBINSON: Yes.

(Whereupon, Adams Deposition Exhibit 5 was marked for identification.)

BY MS. ROBINSON:

Q. So this is a declaration from Mr. Christy. And if we could turn the page, please, I would like to direct your attention to paragraph four.

A. Okay.

Q. The second sentence I'll just read it if that's okay. It says, "As of 8:21 p.m. Mountain on October 2, 2020, this census field supervisor area was 95.63 percent complete."

A. Okay.

Q. So what database reflects the completion percentages in a given census field supervisor area?

MR. SVERDLOV: I'm going to -- I'm going to object on the basis of foundation and also to the extent that the questions concern a document that is the statement of Mr. Christy. I'm going to object on the basis of scope such that the -- scope of the notice such that the witness would be testifying in her personal knowledge, not on behalf of the Census Bureau.

MS. ROBINSON: And I will renew my response. This is squarely from the scope of the notice. Obviously the Census Bureau has the data in its possession that allowed it to make -- that allowed, excuse me, Mr. Christy to make a statement that a census field supervise area was 95.63 percent complete on a certain day at a certain time and the scope of the notice provides that we are here to find out what that data is and where it resides.

MR. SVERDLOV: I don't intend to take up your

time with arguments about the scope. So I have noted my objection for the record.

MS. ROBINSON: Yes.

MR. SVERDLOV: And that's what it is.

MS. ROBINSON: Noted.

BY MS. ROBINSON:

Q. Okay. If you can please answer the question.

A. MOJO Hermes.

Q. Okay. Thank you.

So MOJO Hermes reflects this rate by census field supervisor area. Does it also reflect this rate by city?

A. No.

Q. Does it reflect the rate by tract?

A. No.

Q. Does it reflect the rate by state?

A. No.

Q. Okay. Okay. If I could direct your attention to paragraph seven which is on the next page of this document, please.

He says -- Mr. Christy says, I'll just read it here, "that he pulled the metrics on

various case completion rates to determine whether there were significant differences in the manner for which cases were completed in the CFS area." And then he discusses the completion rates per the CFS area.

Is this data also kept in MOJO Hermes?

MR. SVERDLOV: I'm going to -- I'm going to renew my objection as to scope.

MS. ROBINSON: Okay. Noted.

THE WITNESS: Yes.

BY MS. ROBINSON:

Q. Okay. Is there a field completed cases per attempt in MOJO Hermes?

A. Yes.

Q. Okay. Is this the same -- does completed cases per attempt mean the same thing

as closure rates?

MR. SVERDLOV: Objection, vague and compound.

THE WITNESS: Could you please define closure rates for me.

BY MS. ROBINSON:

Q. Sure. So it's -- well, a live -- let's sure, I'm not sure if it's in this document.

But we talk about completion rates and closure rates that the Census Bureau does.

And so my question is whether completion rates is the same as completed cases per attempt?

A. No.

MR. SVERDLOV: Objection, form.

BY MS. ROBINSON:

Q. And there was another field in MOJO Hermes called completed cases per hour?

A. Yes.

Q. And that metric is kept on a CFS area basis?

A. Yes.

Q. And is that updated every day?

MR. SVERDLOV: Objection, vague.

THE WITNESS: It's updated approximately -- so, yes.

BY MS. ROBINSON:

Q. Okay.

A. While you flip, can we take just a couple minute break, please?

MS. ROBINSON: Of course, of course. Be back

at 1:45.

THE WITNESS: Perfect.

THE VIDEOGRAPHER: Going off the record at 1:40.

(Whereupon, a recess was had at 1:40 p.m., after which the deposition was resumed at 1:47 p.m. as follows:)

THE VIDEOGRAPHER: And we are back on the record at 1:47.

BY MS. ROBINSON:

Q. Thank you. If we could please pull up Exhibit 7.

TECHNICIAN WERT: Sure, stand by. It is on screen now. And, Counsel, this will be marked as Exhibit 6, correct?

(Whereupon, Adams Deposition Exhibit 6 was marked for identification.)

MS. ROBINSON: Yes. Thank you.

TECHNICIAN WERT: Thank you.

BY MS. ROBINSON:

Q. Ms. Adams, have you seen this document

before?

A. Yes.

Q. Okay. I would like to understand a little bit how the metrics on this page are calculated. What data --

A. Okay.

Q. What data is used to calculate the metric that 99.9 percent of addresses nationwide were accounted for in the 2020 census?

MR. SVERDLOV: Objection, vague.

THE WITNESS: Like the exhibit we just talked about that looks kind of like this one, the same spreadsheet on the 650 page document is where these come from. Those, in turn, are calculated from feeder data from CDL and UTS.

BY MS. ROBINSON:

Q. Okay. And do you know what field is used to determine how many addresses have been accounted for?

MR. SVERDLOV: Objection, vague.

THE WITNESS: Yeah, the -- what do you mean by which field?

BY MS. ROBINSON:

Q. Well, there is a numerator and denominator to make this calculation. And I'm wondering what field or column is used for the numerator and the numerator is described as addresses nationwide that have been accounted for?

MR. SVERDLOV: Objection, form.

THE WITNESS: So there isn't one single field that says, yes, this is done or, no, this isn't. It's not quite that straightforward. It's based on whether a given address in our census universe has provided a response in an operation in which -- in which it was included.

So it would be disingenuous of me to say that there is a field; rather has that address been responded in any operation.

BY MS. ROBINSON:

Q. Yes. Okay. And is that data that feeds into that being pulled from CDL?

A. Yes.

Q. Great. Do you know which fields in CDL are being queried to come up with that number?

MR. SVERDLOV: Objection, vague.

THE WITNESS: Yeah. There -- it's not just

one or two fields. And so we need to go through -- we need to go through the documentation to determine exactly which fields are included here.

BY MS. ROBINSON:

Q. Okay. Looking down the page, there is a sentence that's bolded at the beginning of the third paragraph that says, "As of October 16th, approximately 24.1 percent of occupied housing units in the NRFU workload have been enumerated by proxy response."

How is that percent derived?

MR. SVERDLOV: Objection, vague and compound. And I'm also going to renew my scope objection. Scope objection.

BY MS. ROBINSON:

Q. You can answer.

A. Based on data from the CDL.

Q. The sentence also says that the percent is similar to the 2010 rate. Is that information pulled from the CDW?

MR. SVERDLOV: Objection -- same objection as before.

THE WITNESS: No. It would have been in a

2010 -- the 2010 NRFU assessment.

BY MS. ROBINSON:

Q. Is the 2010 NRFU assessment a document?

A. Yes.

Q. Is it a PDF?

A. I believe so.

Q. Do you know where it's maintained?

A. You can find it on the internet.

Q. Okay. Is the data in that assessment pulled from the CDW?

A. I would have to --

MR. SVERDLOV: Objection.

THE WITNESS: Sorry, Alex.

MR. SVERDLOV: Objection, vague. Continue.

THE WITNESS: I'd have to look at the 2010 assessment to see the source data that they used then.

BY MS. ROBINSON:

Q. Okay. The next paragraph down states that "5.6 percent of addresses nationwide have been completed using high quality administrative records, which is 13.9 percent of the NRFU workload."

What data would have been used to calculate that percentage?

MR. SVERDLOV: Same set of objections as before.

THE WITNESS: Yeah, I'm not certain. I would have to go back and ask the people who wrote this where they drew their source data from.

BY MS. ROBINSON:

Q. Okay. Do you know if there is a database that reflects the number of high quality administrative records used for completion?

MR. SVERDLOV: Objection -- I'm sorry. I didn't mean to interrupt you.

MS. ROBINSON: Sorry.

MR. SVERDLOV: Objection, compound.

MS. ROBINSON: Should I repeat it?

MR. SVERDLOV: Yeah. Yeah, we can do that. Let's try it again.

BY MS. ROBINSON:

Q. So my question is, do you know if there is a database that stores the number of high quality administrative records that has been

used for completion?

MR. SVERDLOV: Okay. So objection, vague and compound.

BY MS. ROBINSON:

Q. You may answer.

A. Yeah. Well mI do need clarification because it --

Q. Sure,

A. -- it actually is compound.

Q. I'm just reading the sentence. It's providing a calculation, --

A. Okay.

Q. -- of the percent of addresses that have been completed using high quality administrative records.

So I'm just asking if you know of any database that contains data related to the number of high quality administrative records used for completion.

MR. SVERDLOV: Objection, vague.

THE WITNESS: So the answer I would give is, yes. However, I don't know the source of this particular number and I would want to find out

what that source is before I say definitively where it came from.

BY MS. ROBINSON:

Q. Well, can you please provide your best guess then?

MR. SVERDLOV: Objection. Calls for speculation.

THE WITNESS: All right. It is either CDL or CAES and I don't know which of the two they pulled this from.

BY MS. ROBINSON:

Q. Okay. But CDL and CAES reflect data regarding administrative records?

MR. SVERDLOV: Objection, form and foundation.

THE WITNESS: Yeah, I mean, I think -- like I said, the best answer would come from if we could go find the correct answer rather than me speculating. There is one of two places that this number could have been derived from and I actually would like to be able to find out where that is instead of guessing. I don't know that that's necessarily appropriate.

BY MS. ROBINSON:

Q. If we could move on to Exhibit 8, please.

TECHNICIAN WERT: Stand by one moment. And, Counsel, this will be marked as Exhibit 7, correct?

MS. ROBINSON: Yes.

(Whereupon, Adams Deposition Exhibit 7 was marked for

identification.)

BY MS. ROBINSON:

Q. So this is a transcript of the -- a news briefing by the Census Bureau.

A. Okay.

Q. I would like to turn to page 7. But certainly if you need to read any of it, let me know. But if you could scroll to page 7. Great.

So, yeah, in that last paragraph there that has the yellow highlighting, the first sentence says, "Were able to achieve a numerator productivity number of 1.92 cases per hour versus a 2010 number of 1.01 cases per hour."

Do you know what databases or systems would be used to derive those numbers?

MR. SVERDLOV: Objection, foundation, form and scope. And after -- after witness answers I think it might be appropriate to have maybe an off-the-record conversation between counsel.

MS. ROBINSON: Sure.

THE WITNESS: Yeah. So the 1.92, the numerator productivity number of 1.92 came from MOJO Hermes. The 2010 number would have come from 2010 assessments.

BY MS. ROBINSON:

Q. Is that the 2010 NRFU assessment document you referred to?

A. Yes.

Q. Okay.

MS. ROBINSON: Okay. We can go off the record, Mr. Sverdlov, if you want to.

MR. SVERDLOV: Yes, please. Just for a minute.

THE VIDEOGRAPHER: Going off the record at 1:59.

(Whereupon, a recess was had at

1:59 p.m. after which the deposition was resumed at 2:03 p.m. as follows:)

THE VIDEOGRAPHER: We are back on the video record at 2:03.

BY MS. ROBINSON:

Q. If we could pull up, please, the same exhibit.

Okay. On the next page, page 8, please, there is a sentence in the middle, there's a paragraph that says some of the questions. And if you could maybe make it just a tiny bit bigger for Ms. Adams. It's quite

small. Perfect. Great.

So it's that 24.1 percent, just direct your attention. But the statement says, "As of October 16th when we completed field operations, approximately 24.1 percent of all enumerated occupied housing units were enumerated using information from a proxy."

So would data regarding how many enumerated occupied housing units were enumerated using information from a proxy be

found in the CDL?

A. Yes.

Q. Would it be found in any other databases?

A. You can also calculate it from FOCS, the Field Operational Control System.

Q. Great. Thank you.

A. Yeah.

Q. The next sentence provides a 23.8 percent final proxy number in the 2010 census.

A. Uh-huh.

Q. Are final proxy numbers from the 2010 census reflected in the 2010 NRFU assessment document?

A. Yes. It should be.

Q. Okay. Thank you.

A. Yep, you bet.

Q. The top of the next page, please.

This statement at the very top, once again, addresses how many have been -- how many addresses have been completed using high quality administrative records.

Do you know where that data would be kept?

MR. SVERDLOV: Objection, form.

THE WITNESS: Yeah, like we talked about before, I think it is in CDL, but if it isn't, it's in CAES.

BY MS. ROBINSON:

Q. Thank you.

A. Yeah.

Q. If we could go to page 10, please. Great. The paragraph at the bottom that starts "for example," states a figure for how many SBEs were enumerated in 2010. Would the number of SBE's enumerated for 2010 be found in the 2010 NRFU assessment document?

A. Not in the NRFU assessment. It would be in a different assessment of the SBE process

itself.

Q. Where is that assessment located?

MR. SVERDLOV: Objection, foundation.

THE WITNESS: It would also -- sorry. Did I hear somebody's voice?

MR. SVERDLOV: Continue.

THE WITNESS: Oh, okay.

Presumably it's located in the same location online as the NRFU assessment.

BY MS. ROBINSON:

Q. Besides being online, do you know where in the Census Bureau those assessments are maintained?

MR. SVERDLOV: Objection, foundation.

THE WITNESS: Yeah, I don't know. We would have to go get a location for you.

BY MS. ROBINSON:

Q. Okay. This sentence also provides the SBE number for the 2020 census. Where is that data maintained?

A. That would be in CDL.

Q. Thank you.

A. Yeah.

Q. The sentence also provides metrics on TNSOLs, Targeted Nonsheltered Outdoor Locations.

Is that data also for 2020 in the CDL?

A. Yes.

Q. Where is it for 2010?

MR. SVERDLOV: Objection, foundation.

THE WITNESS: Yeah, it would also be in an assessment somewhere.

BY MS. ROBINSON:

Q. Okay. So it would be in a separate TNSOL assessment?

A. Honest, I don't --

MR. SVERDLOV: Objection.

THE WITNESS: Sorry Alex.

MR. SVERDLOV: Objection, form.

THE WITNESS: Yeah, I don't know if it's in a separate assessment or if they are combined.

BY MS. ROBINSON:

Q. If it were combined, would the -- would it be combined with the SBE assessment?

A. It could be. Like I said, I'm not certain. There is a whole cadre of assessments from 2010.

Q. Could you please go to page 23. So the second paragraph that starts "Because," it says in the second line, "We could tell on the phone how long an enumerator took on every question.

We could tell how long they took when they did the interview, where they were -- where they

were when they took the interview," and they were enumerating because the Geo codes match. Where is this type of data maintained?

A. The CDL.

Q. Okay. Thank you.

I would like to ask a few questions about the field, the field personnel and field management system.

Could you please provide an overview of the field's management structure?

MR. SVERDLOV: Objection, vague and outside the scope of the deposition.

THE WITNESS: Okay. So a little more specific.

BY MS. ROBINSON:

Q. Sure.

A. At what level -- what are you hunting for here?

BY MS. ROBINSON:

Q. I'm interested in how the field -- the various levels in the field communicate with each other and submit data to one another. So I thought it might help to start with the

different levels of field management.

MR. SVERDLOV: Objection, form.

THE WITNESS: Okay. All right. So there is an enumerator. The enumerators work for census field supervisors. Census field supervisors work for census field managers. Census field managers work for area census office managers. Area census office managers work for area managers. Area managers work for ARCMs, assistant regional census manager.

They work for -- and then by that point we're in the regional office staff. Do you need more granular than that or does that get you high enough?

BY MS. ROBINSON:

Q. No, that's very helpful.

A. Okay.

Q. And then where do the field regional directors fit into that?

A. They are a couple of levels above the ARCM.

Q. Okay.

THE COURT REPORTER: Counsel, sorry to interrupt. Could anybody not speaking put yourself on mute.

BY MS. ROBINSON:

Q. And what system is used to assign the work to the enumerators?

A. So in what fashion?

Q. To assign the -- to assign enumerators what households they should visit, everything else they do during NRFU?

MR. SVERDLOV: Objection, vague and compound.

THE WITNESS: FOCS sends the cases to the enumeration device.

BY MS. ROBINSON:

Q. Okay.

A. Assignments can either come as part of the optimization process or they can be directly assigned by a census field manager or someone else with equivalent permissions.

Q. Okay. And are all communications between the census field manager and the enumerator -- I'll ask it again.

How do the census field managers communicate with the enumerators?

A. They can call them. They can text them.

Q. Okay.

A. We're fairly limited because we --

enumerators do not have email.

Q. Okay. What is the process for field personnel, meaning enumerators or census field supervisors, to lodge complaints with their supervisors or the Census Bureau?

MR. SVERDLOV: Objection, vague.

THE WITNESS: Which -- which -- one question, please.

BY MS. ROBINSON:

Q. Sure, I'll ask another way.

A. Okay.

Q. Is there a system that logs complaints from field personnel?

A. Not a single system, no.

Q. Okay. What are the systems that reflect the complaints?

A. There are -- there is various ways that they can lodge complaints. They can call their supervisor and complain. They can call higher up in the chain and complain. They can send emails from their personal email accounts and

complain. There is even public addresses that they can complain to, you know, complain to. And then they have all the normal routes that an employee could -- could complain and we give them that information. They can call these inspector general. They can call the office of special counsel. They can call the EEO office. All of those places can lodge complaints. So there is no one single place we can go to find complaints.

Q. Let's look at an example. Before I do that, is there a correspondence management system?

MR. SVERDLOV: Objection, vague.

THE WITNESS: How do you mean?

BY MS. ROBINSON:

Q. Is there a system called the correspondence management system that you know of?

A. I don't know.

Q. Okay. Do you know if the complaint --

A. It's not on the list.

Q. I know it's not on the list.

Do you know if the complaints are kept in the communications directorate?

A. Depending on the route in which they come in to the Bureau, they can be logged there. So if it comes in through the routes that the communications director logs, yes, they would be

logged there. If it comes in via one of those other routes, not necessarily.

Q. And what are the routes that the communications directorate logs?

A. I don't know. We would have to go find that information for you.

Q. Okay. Do you know if complaints are maintained by the regional offices?

A. I do not.

Q. If complaints are elevated to the Census Bureau headquarters, do you know how those are documented?

MR. SVERDLOV: Objection, vague.

THE WITNESS: Where in headquarters?

BY MS. ROBINSON:

Q. The director, for example.

A. Email.

Q. Okay. Do you know of any central database or repository where the complaints are stored?

A. No.

Q. Do you know who at the Bureau has responsibility for field personnel complaints?

A. I don't know that I understand the question.

Q. I'm wondering if someone like Timothy Olson or James Christy or someone under them would be charged with the responsibility of field personnel complaints?

MR. SVERDLOV: Objection, form.

THE WITNESS: I don't know. I'm sorry.

BY MS. ROBINSON:

Q. That's fine.

Do you know of any processes or procedures determining when a complaint should be elevated to a manager?

MR. SVERDLOV: I'm going to object based on scope.

THE WITNESS: How -- could you clarify a little bit, please?

BY MS. ROBINSON:

Q. Sure. Do you know of any process documents that explain when a complaint should be provided to a manager?

A. I don't.

Q. Okay.

MS. ROBINSON: Could we go to Exhibit 8, please.

TECHNICIAN WERT: Sure. Stand by one moment.

MS. ROBINSON: No, I'm sorry. We've already

done Exhibit 8. We don't need to go to that.

BY MS. ROBINSON:

Q. Could we talk a little bit about post-data collection processing. Is there something called a universe control and management system that was developed to track the enumeration activities of the 2010 census?

A. Yes.

Q. Okay. Does that system exist today?

A. No.

Q. Is the data from that system now in the CDW?

A. The outputs from that system would be.

I don't know if the databases themselves from there would be in the database warehouse.

Q. Would they be archived somewhere else?

A. I don't know.

Q. Okay. Can the Bureau compare how many housing units were resolved via administrative record in a given ACO in 2000 and 2010?

A. We didn't use administrative records in 2000 and 2010.

Q. Okay. What about by proxy? And I'll ask the question again.

Can the Bureau compare how many housing

units were resolved via proxy in a given ACO in 2000 and 2010?

A. The ACO structure is different, so we couldn't make a comparison between the 2010 ACO and a 2020 ACO.

Q. Okay. What about by tract?

A. I don't know. Remember how when we talked about tract-based estimates before and I said I would want to talk to others to determine if there is some subtle nuance I'm not missing? Same answer here.

Q. Okay. But the data for 2000 and 2010 was maintained on a tract basis?

A. The data were main -- are records like we talking about before, so address-by-address records, so presumably, yes, they would be tract-based for at least for 2010.

For 2000, again, I would want to go check documentation.

Q. Okay. And do the tracts change from 2000, 2010, 2020?

A. Yes, they can.

Q. They do. Okay.

MS. ROBINSON: Can we now, please, move to Exhibit 13.

TECHNICIAN WERT: Stand by one moment.

MS. ROBINSON: Actually I'm going to ask a few questions before we put that up.

BY MS. ROBINSON:

Q. Are you familiar with the term data anomalies as it is used by the Census Bureau?

A. Yes.

Q. Okay. So the Census Bureau keeps records of data anomalies?

MR. SVERDLOV: Objection, misleading.
BY MS. ROBINSON:
Q. Does the Census Bureau keep records of data anomalies?
A. Yes.
Q. Okay. Where are those records maintained?
A. There is a tract -- there is a spreadsheet that they have been using to track them for post-processing.
Q. Okay. What is that spreadsheet called?
A. I don't know the name of it.
Q. Who maintains it?
A. It's a good question. We could find out.
Q. Where is it located?

MR. SVERDLOV: Objection, vague.
THE WITNESS: Again, we can find out.
BY MS. ROBINSON:
Q. Where is the spreadsheet that has the data anomalies located? You can answer.
A. I don't know. We could find out.
Q. Okay. Do you know if it's an Excel

spreadsheet?

A. Sorry, my computer just almost shut down on me. That would be inconvenient.

Presumably, it's Excel.

Q. Okay. Okay.

And do you know if the spreadsheet is being populated manually or is it being populated by data from a system like CDL?

A. Manually.

Q. Okay. And how is the data anomaly information being reported to the group that is then filling out the spreadsheet?

MR. SVERDLOV: Objection, form and foundation.

THE WITNESS: So I'm not certain.

BY MS. ROBINSON:

Q. Okay.

MS. ROBINSON: Okay, if we could go to

Exhibit 13 now, please.

TECHNICIAN WERT: And, Counsel, this will be Exhibit 8, correct?

MS. ROBINSON: Yes, right, right. These are from file document.

TECHNICIAN WERT: Okay. Great. Thank you very much.

(Whereupon, Adams Deposition Exhibit 8 was marked for identification.)

BY MS. ROBINSON:

Q. So Ms. Adams, have you seen this document before?

A. Yes.

Q. Okay. Can you tell me what it is, please?

A. DRF1 anomaly summary.

Q. Okay. And do you know where this data came from?

MR. SVERDLOV: Objection, vague.

THE WITNESS: From the issue tracker that they are using to track issues with the DRF1.

BY MS. ROBINSON:

Q. I'm sorry, the DRF1?

A. Yes.

Q. What is the DRF1?

A. Decennial Response File, number 1.

Q. Okay. Right.

So is the issue tracker the same thing as what I was just calling the Excel, or is that a different document?

A. Same thing.

Q. Okay.

A. And to be fair, I don't know that it's Excel. There is some method of tracking it.

Q. Okay. Understood. We'll call it tracker if that makes sense.

A. There you go.

Q. Okay. Thank you.

Do you know how often the tracker is updated?

A. I do not.

MR. SVERDLOV: Objection, foundation.

BY MS. ROBINSON:

Q. Do you know what group put this anomaly summary together?

A. No.

Q. Okay. Okay.

MS. ROBINSON: Could we put up Exhibit 14, please.

TECHNICIAN WERT: Sure. Stand by one moment.

Okay. It's on screen now and this will be marked as Exhibit 9.

(Whereupon, Adams Deposition Exhibit 9 was marked for identification.)

BY MS. ROBINSON:

Q. Okay. If you can go to the next page, please.

Have you seen this document before, Ms. Adams?

A. Yeah, can you scroll through it for me, please.

I've at least seen a version of it, if not this exact version.

Q. Okay. Fair enough.

So this document is titled 2020 Census Post-Collection Processing. And can you tell me what source reflects the data on this document?

MR. SVERDLOV: Objection, form.

THE WITNESS: There is not a data source for it. This is the --

BY MS. ROBINSON:

Q. Okay.

A. -- a list of activities that need to

happen in order -- that happen as we go through our post-collection processing.

Q. Do you know what group authored this document?

A. I am not certain.

Q. Okay. Do you know how this document is used at the Bureau?

MR. SVERDLOV: Objection, vague.

THE WITNESS: Presumably to track whether activities are being completed and to capture status as people discuss them.

BY MS. ROBINSON:

Q. Okay.

MS. ROBINSON: Can we turn to Exhibit 15, please.

TECHNICIAN WERT: Sure. Stand by one moment. And it's on screen now. Counsel, would you like this marked as well? It will be Exhibit 10?

MS. ROBINSON: Yes, thank you.

(Whereupon, Adams Deposition Exhibit 10 was marked for identification.)

TECHNICIAN WERT: Thank you

BY MS. ROBINSON:

Q. And if we could scroll to the next page, please. Is this the tracker we were just discussing of anomalies?

A. This is a document of those anomalies which require patches.

Q. Okay. Is this -- are the anomalies on this document pulled from the tracker?

A. Yes.

Q. Okay. Thank you.

A. Yep, you bet. So I have a question back. How long are we going to go? If we are going to be done in 15 minutes I don't want to stop. If it's going to be another 45 minutes or an hour, I'd want to stop and take a quick break.

Q. So I was hoping to be done at 3. But it could be 3:15, so I'm fine if you want to take a five-minute break.

THE WITNESS: Yeah, can we do five quick?

MS. ROBINSON: Yes.

THE WITNESS: Thank you.

THE VIDEOGRAPHER: Going off the record at 2:32.

(Whereupon, a recess was had at 2:32 p.m., after which the deposition was resumed at

2:39 p.m. as follows:)

THE VIDEOGRAPHER: Back on the record, 2:39.

BY MS. ROBINSON:

Q. Okay. Ms. Adams, can you tell me what the CUF quality indicators are?

A. By that do you mean a series of quality metrics drive once the CUF is created?

Q. Yes.

A. Can you give me examples thereof?

Q. Yes.

A. To make sure we're using the same words.

Q. Identified as duplicate enumerations across different addresses; records that do not contain information sufficient for deduplication; records that require status or count imputation.

Should I keep going?

A. No, no. I understand what you're talking about now. So those are a series of

indicators that -- that can tell us information about the quality of the census.

Q. And where are those applied to the data?

MR. SVERDLOV: Objection, vague.

THE WITNESS: So they aren't applied. They are computed.

BY MS. ROBINSON:

Q. Okay.

A. These are indicators, metrics, one might say, that are computed after the CUF is created that would tell us information about how the census went.

Q. Okay.

A. What the -- what the end result looks like.

Q. And is there a system that's used to calculate those?

A. They are calculated off of the census unedited file.

Q. Are they queried in the file?

MR. SVERDLOV: Objection, vague.

THE WITNESS: Analysts write code to

calculate them.
BY MS. ROBINSON:
Q. Okay. After they are calculated, where are they reflected?
MR. SVERDLOV: Objection, vague.
THE WITNESS: Yeah, how do you mean?
BY MS. ROBINSON:

Q. Are they reflected in the CUF file itself?
A. Oh, okay. No. No. They would be -- they would be published as part of a document.
Q. What document would that be?
A. Part of the data quality group that is producing information. It would be part of a series of -- of documents that would be produced.
Q. Okay. So do you know if quality -- those quality indicators can be searched by tract?
MR. SVERDLOV: Objection, vague.
THE WITNESS: Yeah, I don't know what level they are planning to create the quality indicators at yet.

BY MS. ROBINSON:

Q. Were they -- were the quality indicators by tract in the 2010 census?

A. I don't know.

Q. Okay. Okay.

So sitting here today, could you run a search to determine how many records in a city were duplicates?

MR. SVERDLOV: Objection, vague.

THE WITNESS: No.

BY MS. ROBINSON:

Q. Why not?

A. Because we haven't run the duplication processes. We would need to wait for the CUF to do that.

Q. Could you run a search to determine how many records in a certain county were missing a name?

A. Yeah. So we can do preliminary estimates of those kinds of things, but they are preliminary until the proper post-collection processes are run.

Q. And for those preliminary estimates

what database is used to run those?

A. One second. So you can use CDL. You could also use the DRF1 that's been produced when its ready.

Q. Are any of those -- have any of those preliminary estimates been run?

A. Which ones, from -- give me a list of those that you are interested in.

Q. Sure.

A. Okay, cool.

Q. It's really any of the CUF quality

indicators but some more examples are ones that inquire -- excuse me, ones that required item imputation for race, Hispanic origin, sex and age from administrative records --

A. Yeah.

Q. -- lacking complete names or date of birth.

A. Preliminary estimates have been run on the DRF1.

Q. And what format is that estimate data in?

A. You mean how do we present that to

people? Is that what you mean?

Q. Exactly. Is it in Excel?

A. Yeah, there is a PowerPoint deck with some of the information if it.

Q. Okay.

A. A couple of PowerPoint decks.

Q. And who maintains those decks?

A. It depends on the analyst who is doing the work and at what time. So, for example, the item imputation for, I think you said race and Hispanic origin, there is a slide deck as part of the data quality group. Some preliminary estimates were run and are part of the CIG

decks. So there is a couple of different places where we have been monitoring this over time.

Q. Okay. Are there names for those PowerPoints if we wanted to identify them?

A. I knew you were going to ask that. I don't know what the actual name of the file is. The data quality has a slide deck that has item missing imputation rates, and they are part of the CIG decks over time.

Q. You said they are part of CIG decks?

A. Yes.

Q. Great. I have a couple questions on CIG. So let's do that now?

Q. Do you know when -- well, I'll ask this way. So when you say they are part of the CIG decks, what do you mean by that?

A. So we're talking about something like item imputation, right?

Q. Uh-huh.

A. Okay. So once -- once a week we -- there was a CIG -- there was a CIG presentation from the realtime analysis of data group. And --

Q. Okay.

A. -- sometimes it would include things

like item imputation.

Q. Okay. So the census integration group receives briefings on a weekly basis?

A. Roughly weekly, yes.

Q. And is there a central repository for all of those briefings?

A. Yes.

Q. What is that?

A. It's on a share point site.
Q. Okay. And do you know if those briefings have to be reviewed by the disclosure review board before being made public?
A. Yes.
Q. All of them have to be reviewed by the disclosure review board before being made public?
A. Yes.
Q. Okay. Do all of the briefings have confidential information in them?
A. I don't know if all of them do.
Q. Okay.
A. There was recently an effort to review all of the decks so that they can be provided.
Q. Thank you.
A. Yes.

MS. ROBINSON: Could we please look at Exhibit 17?
TECHNICIAN WERT: Sure. Stand by one moment.
MS. ROBINSON: Thank you.
TECHNICIAN WERT: And, Counsel, do you want this marked as well?

MS. ROBINSON: Yes. Thank you.

TECHNICIAN WERT: This will be Exhibit 11 and it is on screen now.

(Whereupon, Adams Deposition Exhibit 11 was marked for identification.)

MS. ROBINSON: And if you can go to the next page, please.

BY MS. ROBINSON:

Q. So this is an Operational -- and it's a PowerPoint, I think a slide deck, entitled Operational and Processing Options to Meet Statutory Date of December 31st, 2020, For Apportionment dated August 3rd, 2020.

I'm going ask if this document looks familiar, but I will have the tech scroll through it before I ask you that.

MS. ROBINSON: If you could please scroll through.

TECHNICIAN WERT: Sure thing.

MS. ROBINSON: Thank you.

THE WITNESS: Yes, it looks familiar.

MS. ROBINSON: Great.

BY MS. ROBINSON:

Q. Could you please go to page 12 and it might be page -- oh, yes, that's the one. Okay, great.

So I'm asking these questions only from a data processing perspective just to put that context out there. But this document says, first of all, and you can -- I'll give you a minute to read the page maybe and then I'll ask you a couple questions.

A. Okay.

Q. So what steps is the Bureau taking with regards to data to effectuate the presidential memo described here?

MR. SVERDLOV: Hold on one second. I'm going to object on the basis of scope.

I fail to see how this line of questions is at all within the scope of the topics that the plaintiffs have noticed for this deposition. So the witness's testimony on this line of questions will be solely from her

knowledge and not on behalf of the Census Bureau.

MS. ROBINSON: And I'll renew my objection that plaintiff's view it's squarely within the topics because I'm asking about data that resides with the Census Bureau.

MR. SVERDLOV: I'm sorry, one second. Maybe it will be helpful to go off the record because that is not how the question was phrased.

THE VIDEOGRAPHER: Would you like to go off the record, Mr. Sverdlov? Is that what you just said?

MS. ROBINSON: That's fine with me.

THE VIDEOGRAPHER: Okay. Going off the record at 2:52.

(Whereupon, a recess was had at 2:52 p.m., after which the deposition was resumed at 2:57 p.m. as follows:)

THE VIDEOGRAPHER: And we are back on the record at 2:57. Please continue.

BY MS. ROBINSON:

Q. Okay. So what, if any, data sources are being used to effectuate the president's memorandum described on this slide?

A. I don't know the data sources. In order to provide those, we'd need to get a list from the team that's working on it.

Q. Okay. And who is that team?

A. It is led by Dr. Abowd.

Q. Are the data sources that Dr. Abowd is using including in the list of 52 that we discussed earlier?

MR. SVERDLOV: Objection, foundation and form.

THE WITNESS: Yeah, I don't know what sources they are using. So I can't answer whether they are in a list of 52.

BY MS. ROBINSON:

Q. Do you know if there -- well, let's see. The second bullet references using administrative records.

A. Correct.

Q. Do you know how Dr. Abowed's group is using administrative records in this process?

MR. SVERDLOV: I'm going to object on the basis of scope on this testimony. And so the witness would not be testifying on behalf of the Census Bureau. She is testifying in her personal capacity.

THE WITNESS: I don't know. We need to get that information from Dr. Abowd.
BY MS. ROBINSON:
Q. Abowd. Thank you.
The first bullet says that work was already done based on Executive Order 13380.
Do you know -- or please tell me which data sources were used to perform that work.
A. Yeah, again, I don't know. We would have to get that information.
Q. Okay. A few questions regarding the Census Bureau's process for collecting documents in response to document requests.
Is that process the same for both litigation and responding to congressional inquiries?
MR. SVERDLOV: Objection, vague.
THE WITNESS: Yeah, is there a specific incident -- set of collections you are asking about?
BY MS. ROBINSON:
Q. Just generally, does the Census Bureau have a process for responding to litigation

requests?

MR. SVERDLOV: Objection, vague.

THE WITNESS: I guess I don't understand the substance of the question.

BY MS. ROBINSON:

Q. Is there a team that handles responding to litigations requests on behalf of the Census Bureau?

A. Yes.

Q. What is that team?

A. Are we talking about the decennial census now?

Q. I'm referencing litigation requests that are issued to the Census Bureau. What team is responsible for responding to those?

A. Yeah, I don't know if there is one team that responds to every litigation, to all litigation requests from a central location.

Q. Do you know the team that responds to congressional inquiries on behalf of the Census Bureau?

A. I do not know the name of the team.

Q. Do you know the name of the group that

responds on behalf of the Census Bureau to GAO inquiries?

A. So, again, are we -- are we talking about the decennial census itself, inquiries

about the decennial?

Q. Yes.

A. Then, yes, it goes to the decennial census communications office when we can.

Q. Is that office charged with responding to inquiries from Congress?

A. I don't know.

Q. What group is in charge with responding to the recent requests for information from the House Oversight Committee?

A. I don't know the name of the group.

Q. Do you know the name of a person?

A. No.

MS. ROBINSON: Could we please go to Exhibit 24.

TECHNICIAN WERT: Sure. Stand by one moment. And would you like this marked as well?

MS. ROBINSON: Yes, thank you.

TECHNICIAN WERT: Okay, this will be

Exhibit 12, one moment.

(Whereupon, Adams Deposition Exhibit 12 was marked for identification.)

TECHNICIAN WERT: Exhibit 12 is on screen now

BY MS. ROBINSON:

Q. Are you familiar with this document from the House?

A. No.

Q. Are you familiar with an -- I should say, are you prepared to testify today about the Census Bureau's response to the House Oversight Committee's request for documents and subpoena?

A. Do you have a specific question you want me to answer?

Q. Yeah. Are you prepared today to talk at all -- I'm sorry. Are you prepared today to testify about that topic?

A. Not in any sort of detail, no.

Q. Okay.

MS. ROBINSON: So Mr. Sverdlov, one of the topics that you actually had agreed to provide a

witness on was the status of the Census Bureau's responses to document requests from the House Oversight Committee.

Is that Ms. Adams or is that the Department of Commerce witness?

MR. SVERDLOV: So that is Ms. Adams. And I think if Ms. Adams were allowed to consult any of the reference materials that we provided, she

might be in a position to answer your questions.

MS. ROBINSON: Are those the reference materials that you produced this morning to us?

MR. SVERDLOV: Those are the ones I sent to you this morning, yes.

MS. ROBINSON: Okay. Well, I'll ask a few more questions here.

BY MS. ROBINSON:

Q. Is the Census Bureau planning to provide any -- any additional document productions to the House?

A. I don't know.

Q. Could you please look at one of the reference documents in order to answer that question?

A. Sure.

MR. SVERDLOV: So just as a technical matter, how would you like to handle Ms. Adams viewing the materials? I had -- we had provided that material to her in the course of preparation. So I imagine that she might have it in her possession right now.

But I -- given the peculiarities of the online system, I wanted to be sure that we're not crossing wires in terms of what you want her

to be looking at and...

MS. ROBINSON: Right. Frankly, I don't know. Because we haven't -- I haven't been able to look at those documents, given when they were produced. So I would like some testimony on this topic.

MR. SVERDLOV: Yeah. I mean, I can -- I can direct your attention to the reference sheet that I believe Ms. Adams may be testifying from. If I'm incorrect, Ms. Adams can correct me.

MS. ROBINSON: I think -- why don't we do this. Why don't we not have Ms. Adams look at any documents right now. That will give us a

chance to review them and decide which, if any, we actually want to put in exhibits for. I'll ask a few more questions and see if she's able to provide any other testimony on this topic today.

MR. SVERDLOV: So you're welcome to do that, but I will note that the witness has -- has a right and opportunity to consult reference materials that were used in the course of preparing her for a 30(b)(6) deposition.

And so to the extent that you do not permit her to look at those materials and want

testimony without those materials, I want that reflected in the record and I want it to be clear that any inability or -- ability or inability she has to answer these questions is on the basis of her not being given access to the documents.

MS. ROBINSON: Yeah, and I would state that our position is that if she wanted to use reference documents they should have been provided to us far in advance so we could review them and decide whether we thought it was

appropriate and they could be entered as exhibits in the deposition.

But since we haven't had an opportunity to do that, we don't view it as equitable to have her testify from documents.

MR. SVERDLOV: That's a novel position. I'm not familiar with any basis for that position. You are welcome to ask her questions about those documents. You are welcome to authenticate them, to ask her in general terms about the course of their preparation.

But as this is 30(b)(6) deposition, I am aware of no rule, order or procedure that would have required me to run the documents used

in the course of preparing the witness by opposing counsel first.

MS. ROBINSON: No. But to have her reference and testify. I don't even know if they are written by her. I haven't even had a chance to view them.

So I will just ask her the questions I have and we can go from there.

BY MS. ROBINSON:

Q. Ms. Adams, are you aware that there were document requests issued from the House Committee on Oversight and Reform on November 19, 2020, to the Census Bureau?

A. Yes.

Q. What did the Census Bureau do at that time to identify and produce responsive information?

A. I don't know.

Q. What is the process by which the Census Bureau is collecting, reviewing, and producing documents responsive to the House Committee's requests now?

A. I don't know.

Q. Do you know what databases are being used to identify responsive information?

A. No.

Q. Do the documents that you reviewed in preparation for this deposition have that information on them?

A. No.

Q. Do you know if documents were identified for production to that request from

the House before November 24th?

A. I do not.

Q. Do the documents that you used to prepare for this deposition have that information on them?

A. Not that I remember.

Q. Were documents identified for production in response to the House request and then provided to the general counsel for clearance?

A. I don't know.

Q. Were the documents you were provided in preparation for the deposition -- or did the documents you were provided in preparation for the deposition have that information on them?

A. Not that I remember.

Q. Do you know how many productions have been made to the House thus far?

A. No.

Q. Were you provided that information before the deposition?

A. Not that I remember.

Q. Do you know if those productions went

to the disclosure review board?

A. I don't know.

Q. And do you know if the Census Bureau intends to make any future productions to the House Committee on Oversight?

A. I don't know.

Q. I have a couple questions about the document productions in this matter.

Are you prepared to testify on those?

A. To the extent that I know the answers.

Q. Well, as a 30(b)(6) witness, you're supposed to know the answers. So have you been prepared to testify about the document productions made in this litigation?

MR. SVERDLOV: I'm going to renew by objection on the basis of the fact that the witness is not being given access to the reference materials by counsel. So she is answering these without the benefit of being able to consult those materials.

MS. ROBINSON: Okay. Mr. Sverdlov, why don't you point out to me which of the documents you sent this morning would have information for her

about the productions in this matter.

MR. SVERDLOV: Yes, I'm happy to. So in the -- give me one second. In the zip file that I transmitted to you, the document that has the -- that bears the name reference sheet is a sheet that contains information related to that topic.

MS. ROBINSON: Okay.

BY MS. ROBINSON:

Q. And Ms. Adams, are you prepared to testify to anything beyond what is in this document that your counsel just described?

MR. SVERDLOV: Objection.

THE WITNESS: No.

MR. SVERDLOV: I'm sorry. Objection. I'm going to object on that question on the basis of vagueness and mischaracterizing the prior several hours of testimony.

MS. ROBINSON: Okay. Those are all the questions I have. Thank you, Ms. Adams.

THE VIDEOGRAPHER: Anything, Mr. Sverdlov?

MR. SVERDLOV: We reserve the right to read

and sign the transcript.

THE VIDEOGRAPHER: Then this then concludes the deposition. The time is 3:15 p.m. We are going off the video record.